

I have named SHERIFF BRYAN BAILEY AS A defendant because the Jail, its officers and the medical department are under his direct control. He is named as Respondant Superior. He is responsible for the contents of the inmate handbook and the policies of the jail.

I have asked for the names and addresses of the five inmates that were being processed into the jail, and were in the holding cell, and were witnesses to my excessive force claim. Miss. Code Ann. § 47-1-21 titled "SHERIFF TO keep a jail docket." The SHERIFF can review or order the names of the inmate witnesses to be obtained from the "Booking Docket." Miss. Code Ann. § 47-1-29, requires that the SHERIFF report complaints of mistreatment to the board of supervisors. I have filed a formal grievance complaining of excessive force by officer MITCH HALL. See EXHIBIT ONE. Miss. Code Ann. § 47-1-27 states that abuse of a prisoner by a guard is a misdemeanor, and the SHERIFF is the person responsible for initiating any legal proceedings against one of his officers. The SHERIFF is responsible for the contents of the inmate jail handbook which includes rules, punishments for violating rules and prisoner rights as approved by the SHERIFF. Some of the prisoner rights include;

on page 3,

(3) Access to the court's, attorneys and legal materials.

(7) Adequate medical services

on page 13

Grievance procedures.

CLAIM ONEDENIAL OF RIGHT TO MAKE INITIAL PHONE CALL.

(1) On December 23, 2012 Plaintiff was arrested by the Pearl, MS. Police Department and was taken to the Rankin County Jail in Brandon, MS. At about 8:00 PM, Officer Mitch Hall started booking me in. When almost done Mr. Hall asked me for a contact number. I advised Officer Hall that I had no family and that I had been living at Gateway Rescue Mission in Jackson, MS or sleeping in my truck and that I really had no one to contact in case of an emergency. At this time Officer Denise Craig who was the booking supervisor in charge at this time, and had also been helping Mr. Hall book me in stated that "I was a damn liar" and if I did not give a number that she would not allow me a phone call. I asked that I be allowed to call a bondsman, or my church to get my truck. She again told me she was not going to allow me to make a phone call. I asked if I had a right to a initial phone call and she said "not here you don't." This led to a verbal argument which led to Officer Hall using excessive force which is claim two. As a result of not being allowed a phone call I could not inform my pastor Mr. Eric Livingston of Meadowbrook Church of Christ in Jackson, MS. To get my truck, a 2002 Nissan X-Terra which was towed in. When I finally got in contact with my pastor and he tried to retrieve my truck, the storage fees were so high that it was not worth getting it out.

CLAIM TWOEXCESSIVE FORCE, CAUSING INJURY.

(2) WHILE BEING BOOKED INTO THE RANKIN COUNTY JAIL ON DECEMBER 23, 2012, OFFICER MITCH HALL ASKED ABOUT MY MEDICAL HISTORY AND MEDICATIONS I WAS TAKING. I TOLD HIM THAT I HAD JUST HAD A FORTH BACK SURGERY AND THAT I WAS GRANTED DISABILITY IN OCTOBER OF 2012. I GAVE HIM A LIST OF MEDICATIONS. AFTER THE VERBAL ARGUMENT OVER THE PHONE CALL (CLAIM ONE) OFFICER HALL GRABBED ME BY THE NECK AND FORCED ME TO THE HOLDING CELL, OPENED THE DOOR, GRABBED ME BY THE CHEST AND SHOVED ME HARD ENOUGH TO MAKE ME FLY BACKWARDS ACROSS THE CELL WHERE I LANDED RIGHT ON MY LOWER BACK ON THE EDGE OF A METAL BENCH. I FELT MY WHOLE SPINE GO NUMB AND I LOST CONTROL OF MY BLADDER. AFTER A FEW MINUTES THE OTHER INMATES IN THE CELL HELPED ME GET TO THE DOOR WHERE I WAS TELLING OFFICER HALL I NEEDED TO GET TO DOCTOR, THAT SOMETHING HAS HAPPEND TO MY BACK AND I WAS IN EXTREME PAIN. HE TOLD ME TO SIT DOWN. AT THIS TIME SGT. MICHAEL VANHORN OPENED THE DOOR AND I TOLD HIM THAT I NEEDED A DOCTOR, THAT SOMETHING WAS WRONG WITH MY BACK, SGT. VANHORN STATED THAT "I BETTER SIT DOWN OR WE WILL BEAT YOUR ASS AGAIN."

I SHOWED HIM MY PANTS THAT I SOILED AND ASKED FOR ANOTHER PAIR. HE AGAIN TOLD ME TO SIT DOWN. THERE WERE 5 OR 6 OTHER INMATES IN THE CELL WHO WITNESSED THIS. THEY LEFT ME IN THE CELL WITH PANTS THAT I PEED IN ALL NIGHT UNTIL ABOUT 7 OR 8 AM. THIS INCIDENT HAPPENED AT ABOUT 9:00 PM. I HAD HAD SURGERY ON MY L-1 S-5 DISC TO CORRECT A BULGING DISC THAT WAS PRESSING INTO MY NERVE ROOT, THIS IS MY LOWER BACK. THE JAIL HAD A M.R.I. DONE. THEY READ THE REPORT TO ME, THE L-1 S-5 DISC IS RUPTURED OR BULGING AGAIN AND PRESSING INTO THE NERVE ROOT. IT WILL TAKE ANOTHER SURGERY TO CORRECT THIS PROBLEM.

CLAIM THREEINADEQUATE GRIEVANCE PROCEDURE

- (3) THE FOLLOWING IS THE GRIEVANCE PROCEDURE AS COPIED FROM THE 2011 INMATE HANDBOOK PROVIDED BY THE JAIL. PAGE 13, STATES;
 "WHEN AN INMATE REQUEST A GRIEVANCE FORM FROM AN OFFICER, IT IS YOUR DUTY TO ADVISE HIM OR HER TO WRITE A LETTER TO THE JAIL ADMINISTRATOR. UPON THE JAIL ADMINISTRATOR'S RECEIVING THE LETTER THE INMATE WILL BE ESCORTED TO THE JAIL ADMINISTRATOR'S OFFICE TO RECEIVE THE GRIEVANCE FORM AND INSTRUCT HIM OR HER HOW THE FORM IS TO BE FILLED OUT. THE JAIL ADMINISTRATOR WILL RECEIVE THIS FORM AND RESPOND WITH AN ANSWER TO THE INMATE."

PLAINTIFF ASSERTS THAT HE SENT LETTER ON THE FOLLOWING DATES VIA HANDMAIL TO CAPT. EDDIE THOMPSON, WHICH THE HANDBOOK LIST AS THE JAIL ADMINISTRATOR, AND NEVER RECEIVED ANY RESPONSE.

THESE LETTERS ADDRESSED THE INCIDENT IN BOOKING WHERE OFFICER MITCH HALL ASSAULTED ME WHEREBY CAUSING A RUPTURED DISC IN THE L-5, S-1 REGION OF MY LOWER BACK, AND THAT I WAS NOT RECEIVING ANY MEDICAL ATTENTION. I ALSO ASKED FOR THE INMATES NAMES AND ADDRESSES WHO WERE IN THE HOLDING CELL AND WERE WITNESSES TO THE EXCESSIVE FORCE. I ADDRESSED THE MEDICAL ISSUE AFTER BEING TAKEN TO MEDICAL ON DEC. 26 OR 27TH OF 2012 FOR A INITIAL INTAKE SCREENING. NURSE KATY MINOR DID THE INTAKE. I ADVISED HER THAT I NEEDED TO SEE A DOCTOR OR GO ~~TO~~ TO THE HOSPITAL, THAT I HAD HAD A FORTH BACK SURGERY AND THAT I WAS IN A ALTERCATION IN BOOKING AND THAT I WAS IN EXTREME PAIN AND

CLAIM THREE

INADEQUATE GRIEVANCE PROCEEDURE

(3) THAT SOMETHING WAS WRONG WITH MY BACK. SHE SAID SHE HAD HEARD ABOUT MY INJURY AND ASKED WHO I WAS IN THE ALTERCATION WITH, I TOLD HER I DID NOT KNOW THE OFFICERS NAME. SHE HAD ME SIGN CONSENT FORMS TO GET MY MEDICAL RECORDS FROM MY NEUROSURGEON DR. BEN KERR. I ASKED WHEN I COULD SEE A DOCTOR AND SHE SAID AS SOON AS THEY GET MY RECORDS. I SENT LETTERS ON THESE DATES WITH NO RESPONSES; DEC. 27TH 2012, JAN. 4TH 2013, JAN. 14TH 2013, JAN. 25TH 2013, FEB. 13TH 2013, ON FEB. 22ND 2013, I WAS ABLE TO TALK TO LT. ROOSEVELT ROSS, WHO INFORMED PLAINTIFF THAT THE GRIEVANCE PROCEEDURE HAS CHANGED, AND THAT HE WOULD GET ME A GRIEVANCE FORM. HE SAID TO MAKE SURE THAT AN OFFICER LET ME OUT TO PUT IT IN THE HANDMAIL LOCKBOX, NOT TO HAND IT TOO AN OFFICER BECAUSE SOME OF THEM THREW AWAY GRIEVANCES AFTER READING THEM, HE ALSO TOLD ME TO SEND IT TO LT. BEN BLAINE. ON FEB. 24TH 2013, I SENT A GRIEVANCE TO LT. BLAINE, SEE EXHIBIT ONE. AFTER GETTING THE ADDRESS TO THE DISTRICT COURT FROM ANOTHER INMATE I WROTE THE CLERK AND I WAS SENT THE PRISONER COMPLAINT FORM. ON MARCH, 4TH 2013, I ASKED AN OFFICER, A SARGENT, WHO WAS RESPONSIBLE FOR FILLING OUT THE INMATE ACCOUNT STATEMENT FOR THE COMPLAINT. HE TOOK IT AND SAID HE WOULD CHECK. AT THIS TIME I STILL HAD NOT GOTTEN A RESPONSE FROM THE GRIEVANCE I SENT ON FEB. 24TH 2013. ABOUT 30 MINUTES LATER I WAS TAKEN TO LT. BLAINE'S OFFICE AND HE HAD MY

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CLAIM THREE

INADEQUATE GRIEVANCE PROCEEDURE

(3) GRIEVANCE IN FRONT OF HIM (EXHIBIT ONE), He asked me to explain what had happened. I started with the phone call I was denied. #

LT, Blaine told me I should have been allowed a phone call.

I told him what had happened with the officer shoving me and me landing on my back on the edge of a metal bench.

LT, Blaine told me his officers were not allowed to assault prisoners. I told him that for over two months medical has refused to see me, that I am still in extreme pain and that there was something wrong with my back. I also gave him my back history, that I have had four back surgeries and was just put on disability. I am 54 years old. I asked for the name of the officer, and I asked for the names of the inmates who were in the holding cell that were witnesses to the incident and also asked him to question them himself to verify my story. He said he would get back to me. I informed him I was filing a prisoner complaint and that I needed medical help. He said he would try to get me to the doctor, on MARCH, 7TH 2013. I asked about the account statement and he said he would give it to their legal counsel, again this is MARCH, 4TH 2013. LT, Blaine gave me some writing paper and one stamped envelope. He said to write him when I needed copy's and mail service. * (NOTE; I did get to see the doctor on MARCH, 7TH 2013, but only after filing a

CLAIM THREEINADEQUATE GRIEVANCE PROCEEDURE

- (3) A GRIEVANCE AND INITIATING A PRISONER COMPLAINT DID LT. BLAINE HAVE THE DOCTOR SEE ME. I WAS SEEN BY DR. MAURICE MCSHAN 10 weeks AFTER I WAS INJURED. WHEN I EXPLAINED TO DR. MCSHAN ABOUT MY PAIN AND LOSS OF BLADDER CONTROL AT TIME OF THE INCIDENT AND THAT I WAS STILL IN EXTREME PAIN AND THAT I HAVE A LOSS OF BOWEL CONTROL AND MY PRIOR FOUR SURGERIES, HE STATED HE DID NOT KNOW OF MY PRIOR SURGERIES, I TOLD HIM NURSE KATY MINOR HAD ME SIGN CONSENT FORMS TO GET THESE RECORDS IN DECEMBER, 2012 SO I COULD SEE A DOCTOR THEN. DR. MCSHAN LOOKED IN MY FILE AND SHOWED ME THE CONSENT FORMS BUT SAID THERE WERE NO RECORDS AND THAT HE WOULD SEND FOR THEM. ON MARCH 8TH 2013 I WENT BACK TO MEDICAL FOR X-RAYS AND THE NURSE SAID THEY DID RECEIVE THE RECORDS. THEY FAXED THE CONSENT FORMS ON THE 7TH AND RECEIVED MY RECORDS ON THE 8TH. NURSE KATY MINOR DID NOT SEND FOR MY RECORDS AND NEVER INTENDED FOR ME TO SEE A DOCTOR.)* ON MARCH 17TH 2013 I WROTE THE SHERIFF, BRYAN BAILEY A GRIEVANCE, SEE EXHIBIT 1-A INFORMING HIM OF THE ASSAULT IN BOOKING, MY INJURY AND THE CONSTANT PROBLEM WITH MY BACK, AND ASKED FOR THE INMATE ACCOUNT STATEMENT TO BE RETURNED. I ALSO AT THIS TIME WROTE LT. BLAINE ASKING FOR LEGAL MATERIALS AND THE ACCOUNT STATEMENT. ON MARCH 12, 2013, I WAS AGAIN TAKEN TO MEDICAL. THIS TIME I WAS EXAMINED BY DR. MICHAEL REDDIX, WHO KEPT TELLING ME NOTHING WAS WRONG WITH MY BACK. I TOLD HIM WHERE IT HURT AND HOW BAD, TOLD HIM I HAD LOST CONTROL OF MY BOWEL'S. HE DID A RECTAL EXAM AND ORDERED MORE X-RAYS FOR THE NEXT DAY. ON MARCH 25, 2013 I WAS TAKEN TO CROSSGATES HOSPITAL IN BRANDON FOR A M.R.I. ON MARCH 30, 2013, I SENT ANOTHER GRIEVANCE TO THE SHERIFF, EXHIBIT 1-B, AGAIN ASKING FOR THE INMATE ACCOUNT SHEET,

CLAIM THREEINADEQUATE GRIEVANCE PROCEDURE

- (3) COPY'S AND MAIL SERVICE AND TELLING HIM THAT THERE IS SOMETHING WRONG WITH MY BACK. I ALSO WROTE TO LT. BLAINE ASKING YET AGAIN FOR THE ACCOUNT SHEET, EXHIBIT I-C. ON APRIL 1ST 2013 I ASKED LT. ROOSEVELT ROSS IF HE WOULD MAKE SOME COPY'S FOR ME AND HELP ME MAIL MY COMPLAINT TO COURT. HE TOOK THE PAPER'S AND CAME BACK AND TOOK ME TO LT. BLAINE. LT. BLAINE HAD THE PAGES I NEEDED COPIED. HE TOLD ME HE DID NOT KNOW WHAT HAPPENED TO THE ACCOUNT STATEMENT. HE SAID THEY STILL DID NOT HAVE THE M.R.I. RESULTS. LT. BLAINE SAID HE WOULD NOT MAKE COPIES OR MAIL MY COMPLAINT TO COURT. ON APRIL 5TH 2013, WHILE I WAS BEING TAKEN TO COURT I SAW LT. BLAINE, I ASKED HIM ABOUT THE M.R.I. RESULTS AND HE SAID THEY WERE IN AND HE WOULD CALL ME UP LATER TO DISCUSS THEM. ON APRIL 7TH 2013, I SENT ANOTHER LETTER TO LT. BLAINE ASKING FOR THE ACCOUNT STATEMENT SEE EXHIBIT I-D. ON APRIL 16TH 2013, I SENT ANOTHER LETTER TO LT. BLAINE ASKING AGAIN FOR THE ACCOUNT STATEMENT AND ALSO FOR ADDRESSES TO THE COURT CLERK AND DISTRICT ATTORNEY AND A LAW FIRM. AT THIS TIME I HAVE HAD NO RESPONSE FROM THE SHERIFF, AND LT. BLAINE OR MEDICAL HAS ^{NOT} SEEN ME TO DISCUSS THE RESULTS OF THE M.R.I. I ALSO ASKED IF I COULD BE EXAMINED BY A NEUROSURGEON, THIS LETTER IS EXHIBIT I-E. ON APRIL 19TH 2013, I WAS TAKEN TO LT. BLAINE. LT. BLAINE HAD THE M.R.I. REPORT. LT. BLAINE READ THE REPORT TO ME IT STATED THAT MY L5-S1 DISC WAS BULGING AND PRESSING AND OBSTRUCTING MY NERVE ROOT. THE LAST SURGERY I HAD WAS ON THAT DISC AND THE SURGERY CORRECTED THAT PROBLEM. MY BACK DID NOT HAVE THIS PROBLEM UNTIL I WAS SHOVED BY OFFICER MITCH HALL AND I LANDED ON MY BACK ON THE EDGE OF THE METAL BENCH. THE RADIOLOGIST STATED IN HIS REPORT THAT HE HAD NO RECORDS TO COMPARE

CLAIM THREEINADEQUATE GRIEVANCE PROCEEDURE

- (3) TO THIS CURRENT M.R.I., THIS MEANS THE RADIOLOGIST STATED HIS OPINION ABOUT THE INJURY TO MY BACK BASED ON WHAT HE SAW, HIS CONCLUSION WAS UN-BIASED AND MADE WITH NO OTHER MITIGATING EVIDENCE. UNLIKE THE RADIOLOGIST, LT. BLAINE AND THE MEDICAL DEPT. HAVE MY RECORDS FROM MY NEUROSURGEON, SO THEY CAN SEE THAT I HAD SURGERY TO CORRECT THIS PROBLEM. THE MEDICAL DEPT WAS ALSO SUPPOSED TO GET MY RECORDS FROM THE SOCIAL SECURITY ADMINISTRATION, THE JUDGE HAD ORDERED A M.R.I., X-RAYS AND A EXAMINATION BY THEIR NEUROSURGEON, THIS WAS DONE IN THE END OF JULY OF 2012, WHICH WOULD REFLECT THAT THERE WAS NO CURRENT INJURY TO THE L-5 S-1 DISC. LT. BLAINE THEN TOLD ME HE WOULD SEE ME ON APRIL 23, 2013, TO GET ME THE ACCOUNT STATEMENT, AND TO COMPLETE THE GRIEVANCE PROCEEDURE. THE DOCTOR HAS NOT SEEN ^{ME} AT THIS TIME. LT. BLAINE DID NOT SEE ME ON APRIL 23RD, 2013. IT HAS BEEN OVER SIX WEEKS AND LT. BLAINE WILL STILL NOT GIVE ME THE ACCOUNT STATEMENT OR FINNISH THE GRIEVANCE. AND HE HAS NOT GIVEN ME THE ADDRESSES TO THE COURT THAT I REQUESTED. ON APRIL 23RD 2013 I WROTE HIM AGAIN REQUESTING THE ADDRESSES. SEE EXHIBIT 1-E. ON APRIL 28 2013 I AGAIN WROTE TO LT. BLAINE. EXHIBIT 1-E, ASKING HIM TO FINNISH THIS GRIEVANCE PROCESS, TELLING HIM I AM ASKING FOR SURGERY AND THAT I AM IN PAIN. I ALSO AGAIN ASKED FOR THE ADDRESSES TO COURT AND A LAW FIRM AND COPY AND MAIL SERVICE. LT. BEN BLAINE IS REFUSING TO RETURN THE INMATE ACCOUNT SHEET I GAVE HIM ON MARCH 4, 2013. AND LT. BEN BLAINE HAS REFUSE TO COMPLETE THE GRIEVANCE PROCESS, IS REFUSING TO GET ME THE ADDRESSES TO THE COURTS AND HAS REFUSED ME TO MY FACE TO MAKE COPIES AND MAIL MY COMPLAINT TO COURT. LT BEN BLAINE STILL HAS NOT RETURNED THE INMATE ACCOUNT STATEMENT TO ME.

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CLAIM THREE INADEQUATE GRIEVANCE PROCEEDURE

- (3) By MAY 5 2013 I STILL HAVE NOT RECEIVED THE ADDRESSES FOR THE COURT I REQUESTED ON APRIL 16 2013. ON MAY 5 2013 I AGAIN SENT ANOTHER LETTER ASKING HIM TO TAKE ME TO MY NEUROSURGEON WHO WOULD NOT CHARGE FOR THE VISIT, AND FOR HIM TO FINNISH HIS PART OF THE GRIEVANCE AND TO MAKE COPIES OF THIS COMPLAINT AND TO MAIL IT TO THE COURT AND I AGAIN ASKED FOR THE ADDRESSES TO THE COURT. STILL NO RESPONSE BY MAY 13, 2013, SO AGAIN I WROTE TO LT. BLAINE ASKING FOR COPIES AND MAIL SERVICE FOR MY COMPLAINT ALSO FOR THE ADDRESSES TO THE COURTS I HAVE BEEN ASKING FOR, EXHIBIT 1-I. AND EXHIBIT 1-H. ON MAY 20, 2013 I WROTE TO SHERIFF BRYAN BAILEY ASKING HIM TO HELP ME COPY AND MAIL MY COMPLAINT TO THE COURT. I ALSO COMPLAINED ABOUT LT. BLAINE REFUSING TO COPY AND MAIL MY COMPLAINT, EXHIBIT 1-J. I ALSO WROTE AGAIN TO LT. BLAINE ASKING FOR COPIES AND MAIL AND ADDRESSES, EXHIBIT 1-K. ON MAY 23, 2013 OFFICER TIM INGRAM "J21", HAND DELIVERED LT. BEN BLAINES RESPONSE TO MY GRIEVANCE 90 DAYS AFTER RECEIVING IT AND 150 DAYS AFTER INITIATING THE GRIEVANCE PROCEEDURE. THE RESPONSE IS EXHIBIT 1-L. ON MAY 23 2013 I WROTE TO SHERIFF BRYAN BAILEY TO APPEAL THE ANSWER TO LT. BLAINES RESPONSE TO MY GRIEVANCE, EXHIBIT 1-M. THIS APPEAL WAS PUT IN THE HANDMAIL LOCKBOX BY ME. ON MAY 27, 2013 I WROTE TO LT. BLAINE ASKING TO APPEAL HIS DECISION ON THE GRIEVANCE AND ASKED FOR THE ADDRESSES TO THE COURTS AND FOR COPIES OF MY COMPLAINT AND MAIL SERVICE TO THE DISTRICT COURT, EXHIBIT 1-N. ON JUNE 2 2013 I AGAIN WROTE LT. BLAINE FOR COPIES AND MAIL SERVICES TO COURT, AND ADDRESSES TO THE COURT, ALSO FOR MEDICAL HELP, EXHIBIT 1-O.

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CLAIM THREE INADEQUATE GRIEVANCE PROCEDURE

- (3) On June 3, 2013, I Received A letter FROM THE DISTRICT COURT CLERK STATING THAT THE ONE COMPLAINT I SENT WAS FILED AND I NOW HAVE A CIVIL ACTION NUMBER. I THEN SENT ON June 3, 2013 A "MOTION TO COMPEL" ASKING THE COURT TO ORDER THE JAIL TO MAKE COPIES AND MAIL THE REST OF THE COMPLAINT TO THE COURT ALONG WITH A COPY FOR EACH DEFENDANT. ON June 4th 2013, I WAS TAKEN TO AN APPEAL HEARING. THIS MEETING WAS DIRECTED BY AN ATTORNEY REPRESENTING THE SHERIFF'S DEPARTMENT, ALSO PRESENT WERE CAPT. EDDIE THOMPSON, LT. BEN BLAINE, LT. RUTLAND AND NURSE KATIE MINOR, LT. RUTLAND WAS THE ONLY ONE NOT SWORN IN TO TESTIFY. THIS MEETING WAS VIDEO / AUDIO RECORDED. THE ATTORNEY ASKED ME IF I WAS BEING REPRESENTED BY AN ATTORNEY ON THIS CIVIL COMPLAINT I TOLD HIM NO. HE THEN STATED THAT I OR EVERYONE COULD NOT DISCUSS MY CLAIM OF THE ALLEGED ASSAULT SINCE IT WAS NOW IN COURT. WE RESOLVED ALL BUT TWO ISSUES, THE MEDICAL AND THE ACCESS TO THE COURTS THAT WERE IN MY GRIEVANCE. THE ATTORNEY (I DID NOT GET HIS NAME) TOLD LT. BLAINE TO COPY AND MAIL MY COMPLAINT AND CAPT. THOMPSON, LT. BLAINE AND THE ATTORNEY SAID THEY WOULD GET WITH THE DOCTOR (JAIL) AND WITH ME TO DISCUSS ANY FURTHER MEDICAL TREATMENT THAT I MAY NEED. I AM VERY GRATEFUL FOR THIS (THAT IS A FACT). Today is June 5th 2013 AND I AM WRITING TO LT. BLAINE TO ASK HIM TO COPY AND MAIL MY COMPLAINT TO COURT. See EXHIBIT ONE - P.

Rankin County Adult Detention Center
Inmate Grievance Form

LT, Blaine

Inmate Name: Steven Riddle

Cell: 195

Date: 2-24-13

State your grievance below:

ON THE NIGHT OF December 23, 2012 while being booked in by a male officer, we had a verbal disagreement over me being allowed to make a phone call. I was denied a phone call because I was homeless. This officer shoved me into the holding cell door, then when I turned around he shoved me and I landed on my back against the bench. I had just informed this officer I had had my fourth back surgery and was just out on disability. I am filing a U.S. 1983 Prisoner Complaint Form in Federal Court. So far medical has done nothing except give me Naproxin. I hope I am waiting to see the doctor. I have a neurosurgeon Dr. Kerr in Jackson who did this last surgery. I will need help with the following:

- ① - THE ADDRESS FOR THE U.S. DISTRICT COURT clerk, Southern District in Jackson
AND A U.S. 1983 PRISONER COMPLAINT FORM
- ② - THE male officer's name who booked me in on 12-23-12
- ③ - writing materials, and who do I contact to make copies of the lawsuit and who will mail it to Federal Court
- ④ - who do I contact to fill out the Prisoner Account Statement

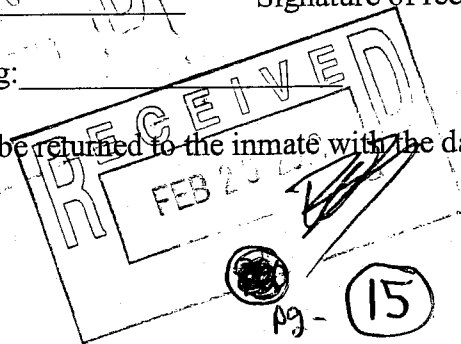
Thank you.

Date received:

Signature of recipient: _____

Date of grievance hearing: _____

A copy of this form will be returned to the inmate with the date of their grievance hearing.



* EXHIBIT ONE *

* HANDWRITTEN COPY OF GRIEVANCE SENT ON 3-17-13 *

Rankin County Adult Detention Center
Inmate Grievance FormInmate Name: Steven RiddleCell: 195Date: 3-17-13

State your grievance below:

SHERIFF BAILEY

THIS IS CONCERNING MY GRIEVANCE DATED 2-24-13, I AM TRYING TO COMPLETE THE SECOND STEP PRIOR TO FILING MY PRISONER COMPLAINT FORM IN FEDERAL COURT. Lt. ^{Blaine} ANSWERED THE FIRST STEP AND THANKFULLY HE GOT ME TO THE DOCTOR. THIS INVOLVED A INCIDENT WHEN I WAS GETTING BOOKED IN ON 12-23-12 WHERE I WAS DENIED A PHONE CALL BECAUSE I WAS HOMELESS AND HAVE NO FAMILY, WHICH LED TO A ARGUMENT AND ME GETTING SHOWN BACKWARDS INTO THE HOLDING CELL WHERE I LANDED ON MY BACK AGAINST THE EDGE OF THE METAL BENCH. I HAD JUST GOT DONE INFORMING OFFICER MITCH HALL THAT I HAD MY FORTH BACK SURGERY AND WAS JUST PUT ON DISABILITY.

AT MEDICAL DR. MCSHAW TOLD ME I WOULD NEED A M.R.I. AND AFTER ALL MY BACK SURGERIES I KNEW THIS, IT IS THE ONLY WAY TO TELL IF THERE IS DISC OR NERVE DAMAGE, THERE IS SOMETHING WRONG WITH MY BACK! MEDICAL HAS DONE REGULAR X-RAYS AND THEY DID A SECOND SET ON MY UPPER BACK. PLEASE COULD YOU HELP ME, I ALSO NEED THE ACCOUNT STATEMENT FILLED OUT. THANK YOU

Date received: _____

Signature of recipient: _____

Date of grievance hearing: _____

A copy of this form will be returned to the inmate with the date of their grievance hearing.

(Pg-15-A)
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* EXHIBIT 1-A *

* HANDWRITTEN COPY *

Rankin County Adult Detention Center
Inmate Grievance Form

Inmate Name: STEVEN RIDDLE Cell: 195

Date: 3-31-13

State your Grievance Below SHERIFF BAILEY

THIS IS THE THIRD GRIEVANCE FORM I HAVE TRIED TO SEND TO YOU. I AM MAILING THIS ONE IN HOPE'S ~~THAT~~ IT WILL REACH YOU. LT. BLAINE HANDLED THE FIRST ONE, ON 3-4-13, BECAUSE OF HIM I FINALLY GOT TO THE DOCTOR. I HAVE THREE THINGS; ONE IS I NEED THE "INMATE ACCOUNT SHEET" FILLED OUT, I GAVE ONE TO LT. BLAINE ON 3-4-13 BUT I HAVE NOT RECEIVED IT YET, I NEED THIS TO FILE MY COMPLAINT INTO COURT. TWO IS AFTER RECEIVING THE ACCOUNT SHEET I WILL NEED COPIES AND MAIL SERVICE TO THE DISTRICT COURT. THREE IS I NEED TO GET A COPY OF THIS GRIEVANCE BACK TO SUBMIT IT WITH MY COMPLAINT. THE ORIGINAL GRIEVANCE CONCERNED A ALTERCATION I HAD WITH OFFICER MITCH HALL ON 12-23-12 WHERE I WAS DENIED A PHONE CALL BECAUSE I WAS HOMELESS, WHICH LED TO WORDS AND LED TO MR. HALL SHOVING ME BACKWARDS ACROSS THE CELL WHERE I LANDED ON MY BACK ON THE EDGE OF THE METAL BENCH. DURING BOOKING I HAD INFORMED MR. HALL THAT I HAD RECENTLY HAD MY FOURTH BACK SURGERY. SOMETHING IS WRONG WITH MY BACK.

Date Received: _____ Signature of Recipient: _____

Date of Grievance Hearing _____

A copy of this form will be returned to the Inmate with the date of their Grievance Hearing.

(Pg 15-B) *

EXHIBIT 1-B *

* HANDWRITTEN COPY *

Lt Blaine

3-30-13

MR. Blaine

I AM ASKING IF YOU COULD PLEASE HELP ME
GET BACK THE INMATE ACCOUNT STATEMENT
THAT I GAVE YOU ON 3-4-13 AND THEN HELP ME
MAIL THE COMPLAINT TO THE COURT. I DID WRITE
THE SHERIFF ON 3-17-13 ON A GRIEVANCE FORM
AND I STILL HAVE NOT HEARD BACK FROM HIM.

I WENT TO THE HOSPITAL AND HAD THE M.R.I.
DONE ON 3-25-13 BUT I HAVE NOT TALKED TO
THE DOCTOR YET ABOUT THE RESULTS.

AGAIN, THANK YOU VERY MUCH FOR GETTING
ME TO THE DOCTOR.

Stu Riddle

P.S. I DO HAVE ANOTHER BLANK ACCOUNT STATEMENT
IF NEEDED.

* EXHIBIT 1-C *

pg 15-C

~~pg 15-C~~

Handwritten copy

LT. Blaine

4-7-13

I Am Hoping you can now help me
get the ACCOUNT STATEMENT, I Am Hoping
To see the Doctor this week to discuss the
M.R.I. Results, This I Hope should conclude
your PORTION OF THE GRIEVANCE PROCESS

* EXHIBIT 1-D *

~~EXHIBIT 1-D~~ Pg 15-D

* HANDWRITTEN COPY *

4-16-13

LT. Blaine

I AM ASKING YET AGAIN IF YOU WOULD HELP ME GET MY COPY OF THE "INMATE ACCOUNT STATEMENT." IT SEEMS THAT AFTER SIX WEEKS, THE PERSON RESPONSIBLE FOR FILLING IT OUT IS REFUSING TOO, OR HAS AND I HAVE AND JUST NOT RECEIVED IT YET. IS IT POSSIBLE THAT YOU COULD JUST VERIFY THAT I HAVE NO FUNDS AND FILL IT OUT YOURSELF SO I CAN GET IT? I ALSO NEED YOU TO COMPLETE THE GRIEVANCE PROCEDURE FOR ME, ALSO IF YOU COULD, I NEED THE FOLLOWING;

THE ADDRESS FOR THE CIRCUIT COURT CLERK AND THE DISTRICT ATTORNEY FOR RANKIN COUNTY, AND THE ADDRESS FOR THE LAW FIRM OF MORGAN & MORGAN IN JACKSON, MS. I ALSO NEED 5 OR 6 BLANK ENVELOPES AND 15 SHEETS OF LEGAL PAPER.

I WOULD LIKE TO ASK IF I COULD BE EXAMINED BY A NEUROSURGEON. NEUROSURGERY IS A SPECIALIZED FIELD AS I KNOW FROM MY EXPERIENCE WITH FOUR LOWER BACK SURGERIES. WHEN A DISC RUPTURES AND SWELLS OUT, AFTER A FEW MONTHS OF REST THE SWELLING WILL GO DOWN, BUT THAT DOES NOT FIX THE PROBLEM. IT'S LIKE PUTTING AIR IN A TIRE WITH A NAIL IN IT, SOONER OR LATER IT WILL BLOW. I DO NOT WANT TO END UP IN A WHEELCHAIR FOR THE REST OF MY LIFE. MY NEUROSURGEON, DR. BEN KERR AT THE JACKSON NEUROSURGERY CLINIC AT ST. DOMINIC'S HOSPITAL IN JACKSON, DID MY MOST RECENT BACK SURGERY. HE HAS THE MOST RECENT M.R.I. AND X-RAYS FROM BEFORE I WAS ARRESTED, WE ATTEND CHURCH TOGETHER, AND AS I MENTIONED TO YOU BEFORE, I KNOW HE WILL EXAMINE ME AT NO COST TO ME OR THE JAIL.

PLEASE WOULD YOU HELP WITH THESE MATTERS.
THANK YOU, STEVE RIDDLE #195

I HAVE HANDED THIS LETTER TO OFFICER TIM INGRAM
ON 4-15-13 AT 10:00 PM

* EXHIBIT I-E *

(A-15-E)

(~~15-13~~)

* Handwritten copy *

4-23-13

LT, Blaine

could you please get me to see you so we
can finish the grievance, also would you please
get me the addresses I had asked for in the last
letter.

Addresses For:

Circuit Court Clerk - Rankin County
District Attorney - Rankin County

The Law Firm of Morgan & Morgan

Thank you

Sh Rm

Steve Riddle #195

pg-15-F

EXHIBIT I-F

* HANDWRITTEN COPY *

4-28-13

LT. BLAINE.

PLEASE LT. BLAINE WILL YOU GET ME TO YOU LIKE YOU SAID
AND FINISH THIS. I NEED TO GET THIS COMPLAINT INTO COURT,
YOU READ THE M.R.I. REPORT YOU KNOW I HAVE TO BE IN PAIN
AND THE ONLY WAY TO CORRECT IT IS TO HAVE SURGERY, AND
THAT IS ONE OF THINGS I AM ASKING FOR IN MY COMPLAINT.

I HAD HAD A FAIRLY RECENT BACK SURGERY TO CORRECT
THIS PROBLEM, MEDICAL HAS MY RECORDS THAT PROVES THIS.
WHAT MEDICAL MIGHT NOT HAVE TOLD YOU IS THEY SHOULD
HAVE GOTTEN MY RECORDS ALSO FROM THE SOCIAL SECURITY

ADMINISTRATION. THE JUDGE ORDERED THEIR OWN M.R.I. AND HAD ME
EXAMINED BY THEIR NEUROSURGEON IN AUGUST OF 2012; AND THIS
WILL SHOW THAT THERE WAS NOTHING WRONG WITH THE L5 S-1 DISC OR
AT THE L-2 L-3 SECTION. I GOT ARRESTED IN DECEMBER 2012.

IM SURE YOU AND THE DOCTOR THOUGHT THAT THE INJURY WOULD SUBSIDE
IN THE 3 MONTHS IT TOOK TO GET THE M.R.I. BUT AS YOU READ ITS NOT GOING
AWAY. ALSO WOULD YOU PLEASE GET ME THE ADDRESS I HAVE BEEN

ASKING FOR. FOR THE COURT CLERK AND DISTRICT ATTORNEY FOR
RANKIN COUNTY, AND FOR THE LAW FIRM OF MORGAN & MORGAN ON STATE
ST. IN JACKSON I BELIEVE. I NEED COPIES OF THIS COMPLAINT
AND MAIL SERVICE TO THE DISTRICT COURT AND I WOULD ASK THAT
I BE PRESENT TO MAKE COPIES AND STAPLE THEM TOGETHER AND
SEAL THEM IN THE ENVELOPE IN YOUR PRESENCE,

THANK YOU LT. BLAINE

pg 15-G

Steve Riddle
STEVE RIDDLE #19
* EXHIBIT 1-G

* HANDWRITTEN COPY *

5-5-2013

LT, Blaine

I AM AGAIN ASKING IF YOU WOULD AT LEAST GET ME TO A NUROSURGEON. I STILL NEED HELP. I WROTE MY CHURCH WHO GAVE MY LETTER TO MY NUROSURGEON, DR. BEN KERR OF JACKSON NUROSURGEON CLINIC AT ST. DOMINICS HOSPITAL, AND IF YOU LET ME CALL HIM IN YOUR PRESENCE, EVEN ON THE SPEAKER PHONE THAT HE WOULD EXAMINE ME AT NO COST TO THE JAIL, YOU WOULD JUST HAVE TO TAKE ME. PLEASE HELP ME MR. BLAINE, FINNISH YOUR PORTION AND HELP ME COPY AND MAIL MY COMPLAINT TO THE COURT

ALSO I NEED TO FILE A MOTION INTO THE ~~COURT~~ CIRCUIT COURT, COULD YOU PLEASE GET ME THE ADDRESSES I HAVE BEEN ASKING FOR,

NAME AND ADDRESS FOR THE CIRCUIT COURT CLERK
AND THE DISTRICT ATTORNEY OF RANKIN COUNTY
AND THE LAW FIRM OF MORGAN & MORGAN IN JACKSON.

THANK YOU

Steve Riddle #195

Pg 15-H

EXHIBIT 1-H

* Handwritten COPY *

MAY 13, 2013

LT. BLAINE

LT. BLAINE I AM AGAIN ASKING IF YOU WOULD CALL
ME UP AND MAKE COPIES AND MAIL MY COMPLAINT TO THE
DISTRICT COURT. ALSO COULD YOU PLEASE GET ME THE
ADDRESSES I HAVE BEEN ASKING FOR TO THE COURTS.

THANK YOU MR. BLAINE

Slr
Steven Riddle #195

EXHIBIT I-I

Pg 15-I

Administrative Remedy

First Step

Inmate Name: Steven Riddle

Date of Complaint: 2-24-13

Inmate's complaint is as reads below or it will be attached to this form:

Attached _____

Reviewed by: BJS

Date Reviewed: 2/26/13

Response to complaint:

During reviewing the complaint received from Inmate Riddle I did find the accusations made to not be true in its entirety. There was disturbance while Inmate Riddle was being booked in on 12/23/12; he became unruly towards the booking staff refusing to give an emergency contact number. (See Report 2012120200) A MRI was conducted as well, the results are in the file.

Delivered on 5/23/2013
Tim Ingram J21

Inmate Signature _____

[Signature]
Jail Administrator

By signing this form I the Inmate do agree with the response giving to me.

P915-L

EXHIBIT 1-L

* HANDWRITTEN COPY #

5-23-13

TO: SHERIFF BAILEY

FROM: STEVEN RIDDLE Cell # 195

RE: GRIEVANCE Filed on 2-24-13

MR. BAILEY

THIS IS IN RESPONSE TO LT. BEN BLAINES ANSWER TO THE FIRST STEP IN THE ADMINISTRATIVE REMEDY PROGRAM.

I WAS HAND DELIVERED THE ANSWER TODAY ON MAY, 23, 2013 BY OFFICER TIM INGRAM "J21" WHO SIGNED THE ANSWER. I WISH TO APPEAL LT. BEN BLAINES RESPONSE, AS I AM NOT SATISFIED WITH THE ANSWER,

Thank you

Stu Riddle

EXHIBIT I-M

Pg 15-M

* Handwritten copy *

MAY 27, 2013

LT. Blaine

THIS IS TO let you know THAT I would like To APPEAL your DECISION ON THE GRIEVANCE AND would you Please send THE SHERIFF A COPY, I CAN NOT BECAUSE you Refuse To make me COPIES OF ANYTHING. I HAVE WRITTEN To THE SHERIFF WISHING To APPEAL. Also you ARE THE one who Told me why back in THE Beginning OF MARCH THAT you would make me copies And mail my complaint To COURT, BUT SO FAR you HAVE Ignored my Request Too DO THIS. NOW AFTER THE M.R.I. SHOW'S AN INJURY To my BACK you will NOT even Respond To ANY OF my letters. ITS OBVIOUS your TRYING To PREVENT me FROM Filing my complaint BUT you CAN NOT STOP IT you CAN ONLY PROLONG IT. THE FEDERAL COURTS HAVE given me THE RIGHT To ACCESS THE COURTS And so does your HANDBOOK BUT you STILL Refuse To Help me. IS THERE ~~ANYONE~~ ANYONE ELSE you WANT me To write Too THAT will copy And mail IT?

Also I STILL need THE ADDRESSES To THE COURTS you HAVE never given me And I now need THE FEDERAL Rules OF CIVIL Procedure. Will you now Help me make COPIES OF my complaint And mail IT To THE DISTRICT COURT.

THANK you

St. Riddle
Steven Riddle #195

EXHIBIT 1-N

pg 15-N

* Handwritten copy *

June 2, 2013

LT. Blaine

Well I Am AGAIN writing and asking IF you would get me up to copy and mail my complaint to DISTRICT COURT, Also I still need the ADDRESSES to the Rankin County Circuit Court Clerk and the DISTRICT ATTORNEY and I still need the MS. Rules of Civil Procedure.

I Am Also Asking IF you would get me to a neurosurgeon. As you should know for the last five months I have not had control of my bowels, this is caused by the ruptured disc pressing on the nerve root. As a result of constantly having crap coming out I have non stop hemorrhoids and these hurt, for the last five weeks I have had non stop bleeding. The jail got rid of DR. Reddix but I have seen the new doctor, I have been thru 2 tubes of cream. The new doctor wants me to go to the hospital to have my insides checked and I am hoping you will approve this. IF you will not get me further medical treatment for my back at least help me file my complaint. I know I'm in jail accused of a crime but I don't think I deserve to suffer like I am.

Thank you

Stu R
Steve Riddle #195

EXHIBIT 1-0

PG-15-0

* Handwritten Copy *

June 5, 2013

LT. Blane

I AM ASKING IF YOU WOULD BRING ME UP TO MAKE THE COPIES, AND TO SEAL THEM IN THE ENVELOPES. I'M NOT TRYING TO GIVE YOU A HARD TIME ABOUT BEING THERE BUT THERE IS A LOT OF PAGES AND SOME ARE LEGAL SIZE AND SOME ARE NOT. IT IS COMMON PRACTICE WHEN AN INMATE HAS LEGAL WORK COPIED AND MAILED TO BE THERE, I HAVE TO MAKE SURE EVERYTHING STAYS IN ORDER AND DOES COPY, AND LEGAL MAIL IS PRIVILEGED MAIL. THANK YOU ALL FOR HELPING ME, AND WHEN OR AS THESE ISSUES ARE RESOLVED I CAN DISMISS THEM FROM THE COMPLAINT OR DISMISS THE WHOLE COMPLAINT.

THE COMPLAINT IS 65 PAGES LONG, AND I NEED 8 COPIES. THE ORIGINAL AND 7 COPIES WILL BE MAILED TO THE COURT AND 1 IS FOR ME TO KEEP. THIS WILL HELP YOU DETERMINE WHAT SIZE ENVELOPES OR PACKAGE TO USE. I AM ALSO HOPING THERE IS A WAY TO ATTACH THEM TOGETHER.

Thank you very much

St. Ruch
Steven Riddle #195

EXHIBIT 1-P

CLAIM FOURINADEQUATE medical services

(4) PLAINTIFF WAS BOOKED INTO THE RANKIN COUNTY JAIL ON DECEMBER 23RD, 2012. IN CLAIM TWO, PLAINTIFF DISCUSSED THE ASSAULT ON HIM BY AN OFFICER AND THE SUBSEQUENT INJURY TO HIS BACK. ON OR ABOUT DEC. 26TH, 2012, I WAS TAKEN TO MEDICAL FOR AN INITIAL INTAKE SCREENING AND WAS SEEN BY NURSE ^{KATIE} KATY MINOR.

NURSE MINOR HAD THE BOOKING INFORMATION THAT LISTED THE PROBLEMS WITH MY BACK. I ADVISED HER AGAIN THAT I HAVE HAD FOUR LOWER BACK SURGERIES, ONE FAIRLY RECENT ON MY L-5 - S1 DISC AND THAT I WAS GRANTED DISABILITY IN OCTOBER OF 2012. I WAS ASKED ABOUT THE INCIDENT IN BOOKING AND I TOLD HER THAT I WAS SHUVED HARD ENOUGH TO FLY ACROSS THE HOLDING CELL AND THAT I LANDED ON MY LOWER TO MID BACK ON THE EDGE OF A METAL BENCH. I TOLD HER MY WHOLE SPINE WENT NUMB AND I HAD LOST CONTROL OF MY BOWELS, AND BLADDER. I ADVISED NURSE KATY THAT I WAS IN EXTREME PAIN AND THAT MY RIGHT LEG AND FOOT WERE NUMB AT THAT I NEEDED TO SEE A DOCTOR. SHE ASKED WHAT OFFICER DID THIS, AT THIS TIME I DID NOT KNOW. (NOTE: WHILE AN INMATE IS IN MEDICAL THERE IS A GUARD PRESENT),

NURSE MINOR HAD ME SIGN CONSENT FORMS TO GET MY RECORDS FROM MY NEUROSURGEON DR. BEN KERR AND MY RECORDS FROM THE SOCIAL SECURITY ADMINISTRATION IN WHICH THE JUDGE HAD ORDERED A MRI AND A EXAMINATION BY A NEUROSURGEON IN AUGUST OF 2012.

THESE RECORDS WILL REFLECT THAT DR. KERR DID CORRECTIVE SURGERY ON MY L-5 S-1 DISC, AND THE S.S.I. RECORDS WILL CONFIRM THAT THERE WAS NO PROBLEM AS OF AUGUST ~~2012~~ 2012 WITH THE L-5 S-1 DISC. I ASKED AGAIN IF I COULD SEE A DOCTOR.

NURSE MINOR TOLD ME THEY WOULD FAX THE ~~RECORDS~~ CONSENT FORMS AND A DAY OR TWO WHEN THEY CAME SHE WOULD HAVE ME SEE A DOCTOR. AT THIS TIME ANOTHER NURSE GAVE ME A TUBERCULOSIS SKIN TEST AND SAID SHE WOULD CHECK IT IN A

CLAIM FOURINADEQUATE Medical Services

- (4) Few days. By JANUARY 7TH 2013, I STILL HAD NOT BEEN TAKEN TO THE DOCTOR. TWICE A DAY THE NURSES COME TO THE CELLS TO PASS OUT MEDICATION. ON JAN 7TH 2013 I SENT IN A MEDICAL REQUEST COMPLAINING OF MY SEVERE BACK PAIN AND MY LOSS OF BOWEL CONTROL AND I ASKED THE NURSE WHEN CAN I SEE THE DOCTOR SHE SAID IT COULD BE 2-3 WEEKS THAT THEY WILL TAKE THE MORE IMPORTANT CASES FIRST AND A DOCTOR ONLY COMES TWICE A WEEK. NOTE; (AS DISCUSSED IN CLAIM THREE I WAS SIMULTANEOUSLY WRITING LETTERS AND FILING GRIEVANCES ABOUT THE ASSAULT AND ABOUT BEING REFUSED MEDICAL TREATMENT.) ON JAN 21ST 2013 NURSE KATY MINOR WAS PASSING OUT MEDICATION AND I ASKED HER WHY I HAVE NOT SEEN THE DOCTOR, SHE SAID SHE DID NOT KNOW BUT I SHOULD BE ON THE LIST. I SENT IN ANOTHER MEDICAL REQUEST AT THIS TIME. BY FEBRUARY 7TH 2013, I STILL HAVE NOT SEEN THE DOCTOR. AT MEDICATION CALL I AGAIN SENT IN A MEDICAL REQUEST AND ASKED THE NURSE WHAT THE PROBLEM WAS SHE TOLD ME IT COULD BE 2-3 WEEKS OR LONGER THAT THE DOCTOR ONLY COMES TWICE A WEEK AND THEY TAKE THE MORE IMPORTANT CASES FIRST. * NOTE * ("AT AROUND MID FEBRUARY 2013, EVERY NURSE THAT WAS HERE FROM MY ARRIVAL AT THE JAIL ON DEC 23, 2012 UNTIL MID FEBRUARY WAS FIRED IN MID FEBRUARY, EXCEPT NURSE KATY MINOR. MRS LAVERN COLLUM WAS THE MEDICAL ADMINISTRATOR AT THIS TIME WAS RESPONSIBLE FOR FIRING THEM. MRS. COLLUM THEN LEFT HER POSITION AS MEDICAL ADMINISTRATOR AND ABOUT 5 WEEKS LATER WAS HIRED AS A GUARD HERE AT THE JAIL. AS MEDICAL ADMINISTRATOR MRS. LAVERN COLLUM WORKED FOR DR. MICHAEL REDDIX WHO IS THE OWNER OF "HEALTH ASSURANCE" THE MEDICAL PROVIDER FOR THE JAIL. DR. MICHAEL REDDIX IS ALSO THE DOCTOR WHO SEE'S INMATES.")*

CLAIM FOURINADEQUATE medical Services

(4) By Feb 18, 2013, I STILL HAVE NOT SEEN OR HEARD FROM THE DOCTOR AND AGAIN I SENT IN ANOTHER MEDICAL REQUEST. ABOUT 2 DAYS LATER I STARTED RECEIVING NAPROXIN. THE NURSE TOLD ME AT MEDICATION CALL THAT I WOULD RECEIVE IT FOR SIX DAYS AND THAT I SHOULD BE ON THE LIST FOR THE DOCTOR. *NOTE; (ON Feb 24TH 2013, I SENT A GRIEVANCE TO LT. BEN BLAINE ABOUT MY INJURY AND MEDICAL REFUSING TO SEE ME, EXHIBIT-ONE)*

ON ABOUT Feb 26TH 2013, I STILL HAVE NOT SEEN THE DOCTOR. I SENT IN ANOTHER MEDICAL REQUEST AND WAS GIVEN ANOTHER 6 DAYS OF NAPROXIN AND WAS TOLD AGAIN I SHOULD BE ON THE LIST TO SEE THE DOCTOR. *NOTE; (AS DISCUSSED IN ISSUE THREE I WAS FED UP WITH BEING IGNORED BY THE JAIL ADMINISTRATION AND THE MEDICAL DEPT SO I WROTE THE DISTRICT COURT CLERK AND THEY SENT ME THE PRISONER COMPLAINT. ON MARCH 4TH 2013 I SENT THE PRISONER ACCOUNT STATEMENT VIA A JAIL GUARD TO HAVE IT FILED OUT. 20 MINUTES LATER I WAS IN LT. BEN BLAINE'S OFFICE. AFTER 70 DAYS OF BEING IGNORED IT TOOK ME INITIATING A CIVIL COMPLAINT TO GET SEEN.)* LT BEN BLAINE TOLD ME HE WOULD TRY TO GET ME TO THE DOCTOR. ON MARCH 6TH 2013, I WAS TAKEN TO MEDICAL AND SCREENED BY THE NURSES AND ASKED WHAT MY COMPLAINT WAS I TOLD THEM THE SAME THING I HAVE BEEN WRITING TO YOU ABOUT FOR OVER TWO MONTHS THAT YOU SHOULD HAVE MY MEDICAL RECORDS FROM MY DOCTOR AND I KNOW I HAVE A HISTORY OF BACK PROBLEMS. ON MARCH 7TH 2013 I WAS BROUGHT TO MEDICAL AND SAW DR. MAURICE MCSHAN I EXPLAINED TO HIM ABOUT THE ASSAULT AND INJURY TO MY BACK IN BOOKING ON Dec 23 2012. I TOLD HIM THAT I HAVE LOST CONTROL OF MY BOWELS AND THAT MY RIGHT LEG AND FOOT WERE NUMB. I TOLD HIM I AM HAVING SEVERE PAIN IN MY LOWER BACK AND PAIN

CLAIM FOURINADEQUATE MEDICAL SERVICES

(4) IN MY MID BACK, I TOLD HIM I WAS SCARED THAT IT WAS ANOTHER RUPTURED DISC. DR. MCSHAN STATED "YOU HAVE HAD BACK SURGERY BEFORE"? I TOLD HIM I HAVE HAD FOUR SURGERIES AND YOU SHOULD HAVE MY RECORDS. HE THEN LOOKED IN MY FILE AND THERE WERE NO RECORDS FROM MY NEUROSURGEON OR THE SOCIAL SECURITY ADMINISTRATION, BUT HE SAW THE CONSENT FORMS THAT KATY MINOR HAD ME SIGN ON DEC 26TH 2012 AND SHOWED IT TO ME. NURSE KATY MINOR HAD NEVER SENT FOR MY MEDICAL RECORDS AND NEVER INTENDED TO LET ME SEE A DOCTOR.

DR. MCSHAN SAID HE WOULD SEND FOR MY RECORDS AND WOULD ORDER X-RAYS TO MAKE SURE THERE WERE NO FRACTURES AND SAID IT WOULD TAKE A M.R.I. TO SHOW DISC OR NERVE DAMAGE.

DR. MCSHAN ALSO WROTE ME A MEDICAL PROFILE FOR A LOWER BED AND FOR EXTRA TOILET PAPER. ON MARCH 8TH 2013 I WAS TAKEN TO MEDICAL AND HAD X-RAYS DONE ON MY BACK. THE NURSE TOLD ME THAT DR. MCSHAN WAS TRYING TO GET ME A M.R.I. AND THAT THEY NOW HAVE MY MEDICAL RECORDS. ON MARCH 7TH 2013 MEDICAL FAXED THE CONSENT FORM TO MY DOCTOR AND ON MARCH 8TH 2013 THEY WERE SENT. ON MARCH 12TH 2013 I WAS AGAIN TAKEN TO MEDICAL, (I DID NOT FILL OUT A MEDICAL REQUEST FOR THIS) AT THIS TIME I DID NOT KNOW WHO THE DOCTOR WAS, BUT IT WAS DR. MICHAEL REDDIX.

DR. REDDIX ASKED WHAT MY COMPLAINT WAS AND I EXPLAINED EVERYTHING TO HIM. HE TRIED TO TELL ME THAT THERE WAS NOTHING WRONG WITH MY BACK THAT I ALWAYS HAVE HAD THESE SYMPTOMS.

I TOLD HIM THAT YOU NOW HAVE MY MEDICAL RECORDS FROM MY NEUROSURGEON AND HE SHOULD KNOW I HAD MY LAST SURGERY TO CORRECT ANY PROBLEMS I HAD WITH THE L5 S-1 DISC. I SAID ONLY AFTER ~~BEING~~ MY BACK SLAMMED AGAINST THE EDGE OF A

CLAIM FOURINADEQUATE medical Services

(4) METAL BENCH DID I START TO lose CONTROL OF my Bowels And my RIGHT leg And FOOT went numb. I Also Told Him I Have extreme Pain in my lower BACK And I CANT Bend OR Twist without Pain I Also Told Him I NOW Have some Pain And Soreness in my mid BACK. I Told Him I WAS SCARED THERE WAS AGAIN SOMETHING WRONG WITH my BACK AND THAT IM going ON 55 years old And I could NOT Handle A FIFTH BACK Surgery. I did Tell Him THAT my Neurosurgeon DR. Ben Kerr And I go TO CHURCH TOGETHER AND IF THEY would get me THERE DR. KERR would NOT CHARGE me OR THE JAIL FOR THE examination And POSSIBLY THE M.R.I.

DR. Reddix Replied THAT most doctors who HAVE A PRACTICE DONT WANT HANDCUFFED INMATES "PARADED" INTO THEIR OFFICE. I HAVE Told THE SAME THING TO LT. Ben Blaine. ON MARCH 13TH 2013, I WAS TAKEN TO medical And HAD MORE X-RAYS Done ON my BACK. ON MARCH 25TH 2013 I WAS TAKEN TO CROSSGATES HOSPITAL IN BRANDON, MS. And HAD A M.R.I. Done.

ON MARCH 27TH 2013 NURSE KATY MINOR HAD me sign A CONSENT FORM TO get THE M.R.I. RESULTS FROM CROSSGATES HOSPITAL.

ON APRIL 16TH 2013 DURING medication call I ASKED nurse KATY MINOR IF I HAD TO send A medical Request TO see THE DOCTOR ABOUT THE M.R.I. RESULTS SHE STATED I HAD A APPOINTMENT.

ON APRIL 12, 2013 I DID Send in A medical Request TO see THE DOCTOR ABOUT THE M.R.I. And my BACK PAIN. ON APRIL 19TH 2013 LT. Ben Blaine CALLED me TOO HIS OFFICE And Read me THE M.R.I. RESULTS (See CLAIM THREE Pg. 5). ON APRIL 25TH 2013 I WAS FINALLY TAKEN TO medical one month AFTER THE M.R.I. They NEVER Refilled THE medicine when IT RAN OUT.

CLAIM FOUR

INADEQUATE medical Services

(4) AT THIS TIME ON APRIL 23RD 2013, I WAS SEEN AGAIN BY DR. MICHAEL REDDIX. I HAD TAKEN A PEN AND PAPER AND WHEN I SAT DOWN I ASKED THE DOCTOR HIS NAME HE TOLD ME, UNTIL THEN I DID NOT KNOW DR. REDDIX'S NAME. I ALSO ASKED HIM WHO HE WORKED FOR, WHAT WAS THE NAME OF THE MEDICAL PROVIDER. HE TOOK A FEW MOMENTS BUT HE TOLD ME IT WAS "HEALTH ASSURANCE".

HE THEN ASKED ME WHAT I NEEDED. I REMINDED HIM ABOUT THE M.R.I. AND I WOULD LIKE TO KNOW WHAT THE RESULTS WERE.

HE THEN READ ME THE PORTION ABOUT THE L-5 S-1 DISC, THE REPORT STATED THAT THE DISC WAS AGAIN RUPTURED OR PROTRUDING AND OBSTRUCTING THE NERVE ROOT. HE THEN SAID THAT THIS IS WHAT I HAVE ALWAYS HAD WRONG. I REPLIED THAT HE NEEDED TO READ MY NEUROSURGEONS REPORT THAT I HAD RECENTLY HAD SURGERY TO CORRECT THIS PROBLEM. THIS PROTRUDING DISC IS WHAT IS NOW CAUSING MY LOSS OF BOWEL CONTROL AND MY RIGHT LEG AND FOOT TO BE NUMB, THE DISC IS AGAIN RUPTURED AND PRESSING ON THE NERVE ROOT. I DID TELL DR. REDDIX THAT MY LOSS OF BOWEL CONTROL HAS EASED UP. I DID TELL HIM I AM STILL IN A LOT OF PAIN. I ASKED HIM WAS THERE ANYTHING ELSE AND HE SAID NO. I TOLD HIM THAT LT. BLAINE READ ME THE REPORT AND SAID SOMETHING ABOUT THE L-2 L-3 DISC. HE THEN REMOVED ANOTHER PAGE AND IT DID MENTION SOMETHING ABOUT THE L-2 L-3 SECTION. THIS IS ABOVE THE L-5 DISC. I HAD COMPLAINED OF PAIN IN MY MID BACK. I ASKED HIM FOR SOMETHING FOR THE PAIN AND HE GAVE ME TYLENOL FOR 3 WEEKS. AS I WAS GETTING UP TO LEAVE DR. REDDIX STOPPED ME AND TOLD ME HE KNOWS IM SUING PEOPLE AT THE JAIL. HE SAID THAT IF I SUE THE HEALTH PROVIDER "HEALTH ASSURANCE" THAT I WOULD BE SUING HIM BECAUSE HE IS THE OWNER.

CLAIM FOURINADEQUATE MEDICAL SERVICES

- (4) I TOLD DR. REDDIX THAT I WOULD LIKE TO SEE A NEUROSURGEON WHO IS A SPECIALIST, NOW THAT HE KNOWS THERE IS A PROBLEM WITH MY BACK. DR. REDDIX IS NOT A NEUROSURGEON. THE ONLY WAY TO CORRECT THE INJURY TO MY BACK WILL BE SURGERY.

Conclusion

IT IS A FACT THAT PRISONERS AND GUARDS WILL HAVE PHYSICAL ALTERCATIONS THAT COULD RESULT IN SOME TYPE OF INJURY. IT IS A COMMON PRACTICE THAT WHEN AN INMATE RECEIVES VISUAL WOUNDS FROM AN OFFICER, THE INMATE IS ISOLATED UNTIL THE WOUNDS HEAL.

PLAINTIFF IS ALLEGING THAT ON DEC 23, 2012, OFFICER MITCH HALL USED EXCESSIVE FORCE WHICH CAUSED A INJURY AND BRUISING TO HIS BACK. PLAINTIFF ASSERTS THAT THERE WERE 5 TO 6 INMATES WHO WITNESSED THIS. PLAINTIFF ASSERTS THAT ON ABOUT DEC 26, 2012, HE WAS TAKEN TO MEDICAL FOR HIS INITIAL INTAKE PHYSICAL / SCREENING WHERE HE WAS QUESTIONED BY NURSE KATY MINOR ABOUT HIS PRIOR BACK HISTORY AND MEDICATIONS AND ABOUT THE INJURY SUSTAINED IN BOOKING.

PLAINTIFF ADVISED NURSE KATY MINOR THAT HE WAS IN EXTREME PAIN, HAS LOST BOWEL CONTROL AND HAD NUMBNESS IN HIS RIGHT LEG AND FOOT, AND HAD SORENESS AND BRUISING ON HIS LOWER TO MID BACK. PLAINTIFF ASKED NURSE MINOR TO LOOK AT HIS BACK AND WOULD SHE GET HIM TO A DOCTOR. NURSE MINOR SAID SHE WOULD SEND FOR MY RECORDS FROM MY NEUROSURGEON AND THE SOCIAL SECURITY DOCTORS AND WOULD HAVE ME SEE THE DOCTOR IN A FEW DAYS. THIS IS A FACT THAT IS EVIDENCED BY THE MEDICAL RECORDS RELEASE CONSENT FORMS NURSE MINOR HAD ME SIGN ON DEC 26, 2012 AND ARE PART OF MY FILE.

IT IS A FACT THAT FROM THE TIME OF MY INCARCERATION ON DEC 23, 2012 UNTIL AROUND MID FEBRUARY OF 2013 THE ENTIRE MEDICAL STAFF OF NURSES WERE UNQUALIFIED AND INCOMPETENT

CLAIM FOURInadequate Medical Services

- (4) TO PERFORM THE DUTIES REQUIRED BY THE MEDICAL PROVIDER AT THIS JAIL. THIS IS EVIDENCED BY THE FACT THAT EVERY NURSE EXCEPT KATY MINOR WAS FIRED AROUND MID FEBRUARY 2013.

PLAINTIFF ASSERTS AS ONE EXAMPLE OF THE INCOMPETENCE OF THE MEDICAL STAFF, THAT AT HIS INITIAL INTAKE SCREENING HE WAS GIVEN A TUBERCULOSIS SKIN TEST. IT IS PROCEEDURE TO CHECK FOR THE RESULTS IN 72 HOURS. PLAINTIFF HAS NEVER BEEN CHECKED. PLAINTIFF SUBMITS EXHIBIT-2 WHICH IS A STATEMENT SIGNED BY 10 INMATES THAT STATES THAT THEY WERE GIVEN THE T.B. SKIN TEST AND WERE NEVER CHECKED FOR THE RESULTS. THESE ARE JUST THE INMATES IN ONE 28 MAN CELL. BY THE MEDICAL PROVIDER NOT HIRING COMPETENT STAFF ALL THE INMATES AND STAFF IN THIS JAIL WERE SUBJECTED TO THE T.B. VIRUS. PLAINTIFF ASSERTS THAT THE MEDICAL PROVIDER IS RESPONSIBLE FOR THE HIRING OF ITS STAFF. PLAINTIFF ASSERTS THAT THE MEDICAL PROVIDER DECIDED THAT NURSE KATY MINOR WAS COMPETENT ENOUGH TO RETAIN HER POSITION. PLAINTIFF ASSERTS THAT THE NAME OF THE MEDICAL PROVIDER IS "HEALTH ASSURANCE LLC" AND THE OWNER IS DR. MICHAEL REDDIX ~~IS~~ THE OWNER OF SAID COMPANY AND IS ALSO A DOCTOR HERE AT THE JAIL. PLAINTIFF ASSERTS THAT THAT DR. MICHAEL REDDIX AS HEALTH ASSURANCE WAS AWARDED THE CONTRACT TO BE THE MEDICAL PROVIDER BECAUSE HIS COMPANY SUBMITTED THE LOWEST BID TO PROVIDE MEDICAL SERVICES TO THE JAIL. PLAINTIFF ALLEGES THAT AS THE OWNER OF THE MEDICAL PROVIDER AND AS A DOCTOR THAT TREATS THE INMATES DR. MICHAEL REDDIX'S GOAL IS TO CONTROL THE ^{OF INMATES} MEDICAL COST, AT THE EXPENSE OF THE MEDICAL WELL BEING ~~MAINTAIN~~ TO HIS CONTRACT. PLAINTIFF ALLEGES THAT THERE WAS A "UNDERSTANDING" BETWEEN DR. MICHAEL REDDIX AND THE RANKIN COUNTY SHERIFF'S DEPARTMENT TO IGNORE MY REPEATED PLEAS FOR HELP UNTIL MY INJURIES SUBSIDED OR UNTIL I STOPPED SEEKING HELP TO PROTECT

Page 9 of 15

CLAIM FOURInadequate medical services

(4) OFFICER MITCH HALL AND THE RANKIN COUNTY JAIL. PLAINTIFF ASSERTS THAT FOR 70 days HIS Pleas For Help were Ignored BOTH By THE JAIL ADMINISTRATION (claim three) AND THE medical DEPT. PLAINTIFF ASSERTS THAT ONLY AFTER INITIATING A CIVIL ACTION AND SUBMITTING AN "INSTITUTIONAL ACCOUNT FORM" WAS HE THEN SEEN By LT, Ben Blaine THE JAIL ADMINISTRATOR. PLAINTIFF ASSERTS THAT 2 days later ON MARCH 7 2013 AT LT, Ben Blaines Request He WAS FINALLY TAKEN TO A DOCTOR. PLAINTIFF ASSERTS THAT ON MARCH 7th 2013 He WAS EXAMINED By DR. MAURICE MCSHAN WHO SHOWED CONCERN By THE symptoms AND Pain Related To Him By PLAINTIFF AND ORDERED X-RAYS TO CHECK FOR FRACTURES AND SAID He WOULD HAVE TO GET APPROVAL FOR A M.R.I. PLAINTIFF INFORMED DR. MCSHAN OF HIS FOUR PRIOR BACK SURGERIES AND THAT NURSE MINOR HAD GOTTEN my medical Records. DR. MCSHAN LOOKED FOR THE medical Records AND STATED THAT THEY DID NOT HAVE THEM BUT He FOUND THE CONSENT FORMS NURSE KATY MINOR HAD me SIGN ON ABOUT Dec 26th 2012 AND He SHOWED THEM TO me AND SAID He WOULD send FOR them. They DID ARRIVE THE NEXT DAY ON MARCH 8th 2013. IT IS A FACT THAT NURSE KATY MINOR NEVER SENT FOR my medical Records. PLAINTIFF ALLEGES THAT NURSE MINOR NEVER INTENDED TO OR WAS PREVENTED FROM sending FOR my medical Records AND IT WAS NEVER INTENDED FOR me TO see A DOCTOR, TO PROTECT OFFICER MITCH HALL AND THE JAIL. NURSE KATY MINOR WAS THE ONLY COMPETENT NURSE WHO WAS NOT FIRED.

PLAINTIFF ASSERTS THAT ON MARCH 12, 2013 ON medical's Request He WAS TAKEN TO see DR. MICHAEL REDDIX WHO AS THE OWNER OF THE medical PROVIDER WOULD decide WHETHER OR NOT TO HAVE A M.R.I. PERFORMED. DR. REDDIX REPEATEDLY INSISTED THERE WAS NOTHING WRONG WITH me, THAT IT WAS JUST my old INJURIES. I TOLD DR. REDDIX TO READ my NEUROSURGEON'S RECORD AND He WOULD see

CLAIM FOUR

Inadequate medical services

(4) THAT I HAD CORRECTIVE SURGERY BEFORE I CAME TO JAIL, AND THAT I WAS FINE UNTIL OFFICER MITCH HALL CAUSED MY INJURY. I TOLD DR. REDDIX THAT AS A DOCTOR HE SHOULD KNOW THAT THE SYMPTOMS I HAVE, LOSS OF BOWEL CONTROL AND A NUMB RIGHT LEG AND FOOT ARE INDICATIVE OF A RUPTURED DISC PRESSING ON THE NERVE ROOT. DR. REDDIX THEN EXAMINED MY BACK AND COMMENTED ON THE LACK OF BRUISING THEN STATED THAT IT HAD BEEN TWO MONTHS SINCE THE INJURY SO IT WOULD BE GONE THEN HE DID A RECTAL EXAM.

PLAINTIFF ASSERTS THAT HE WAS TAKEN TO CROSSGATES HOSPITAL IN BRANDON, MS. ON MARCH 25TH 2013 90 DAYS AFTER THE INJURY AND HAD A M.R.I. DONE. PLAINTIFF ASSERTS THAT ON APRIL 25TH 2013 HE WAS TAKEN TO DR. REDDIX WHO THEN ASKED ME "WHY AM I HERE".

I TOLD HIM I WOULD KIND OF LIKE TO KNOW WHAT WERE THE RESULTS OF THE M.R.I. HE STATED THERE WAS NOTHING WRONG. I ASKED IF I COULD READ THE REPORT. DR. REDDIX THEN READ IT TO ME. THE RADIOLOGIST WHO WROTE THE REPORT STATED THAT HE HAD NO RECORDS TO COMPARE TOO. THIS MEANS THAT HE GAVE HIS OPINION BASED SOLEY ON THE FACTS IN FRONT OF HIM. IT IS A FACT THAT THE REPORT STATED THAT I HAVE A RUPTURED / ~~Bulging~~ Bulging DISC AT L-5 S-1 THAT IS OBSTRUCTING THE NERVE ROOT. PLAINTIFF ASSERTS THAT THIS IS WHAT IS CAUSING HIS PAIN, LOSS OF BOWEL CONTROL AND THE NUMBNESS IN HIS RIGHT LEG AND FOOT. IT ALSO STATED SOME KIND OF PROBLEM AT THE L-2 AND L-3 REGION. PLAINTIFF ASSERTS THAT DR. REDDIX STILL INSISTED I HAVE ALWAYS HAD THIS PROBLEM. I REITERATED TO DR. REDDIX THAT I HAD SURGERY TO CORRECT THIS PROBLEM BEFORE I CAME TO JAIL. PLAINTIFF ALLEGES THAT THE JAIL ADMINISTRATION AND DR. REDDIX AT THE EXPENSE OF MY PAIN AND SUFFERING IGNORED MY PLEAS FOR HELP FOR OVER TWO MONTHS TO SAVE MONEY AND IN THE HOPES THAT I WOULD QUIT COMPLAINING AND ONLY DECIDED

CLAIM FOURInadequate medical services

(4) They would help me AFTER I INITIATED A CIVIL SUIT. IN THE END THEY STILL PUT OFF THE M.R.I. 90 DAYS IN THE HOPES THAT THE INJURY WOULD HAVE SUBSIDED ENOUGH NOT TO BE ~~detected~~ DETECTED BY THE M.R.I.

PLAINTIFF ASSERTS THAT THEY WERE WRONG. THE INJURY IS THERE AND IS EVIDENCED BY THE FACT OF THE M.R.I. REPORT AND THIS INJURY IS NOT GOING AWAY WITHOUT SURGERY. IN SUPPORT OF PLAINTIFF'S ALLEGATIONS THAT DR. MICHAEL REDDIX AS "HEALTH ASSURANCE" PLACES "PROFIT" WHICH INCLUDES KEEPING MEDICAL EXPENSES DOWN FOR THE JAIL IN ORDER TO MAINTAIN HIS CONTRACT AS MEDICAL PROVIDER, OVER THE MEDICAL WELL BEING OF THE INMATES, PLAINTIFF SUBMITS EXHIBITS 2-A THRU 2-E. EXHIBIT 2-A IS A STATEMENT FROM AN INMATE WHO STATES HE REPEATEDLY SENT MEDICAL REQUEST FOR HELP SINCE THE LAST WEEK OF MARCH 2013. THIS STATEMENT IS SIGNED AND DATED APRIL 25TH 2013 AND THIS INMATE STILL HAS NOT SEEN THE DOCTOR.

EXHIBIT 2-B IS AN INMATE WHO DID SEE A DOCTOR AT HIS INITIAL INTAKE SCREENING ABOUT HIS SKIN DISEASE IN THE LAST WEEK OF OCTOBER OF 2012. THE DOCTOR TOLD HIM SHE WOULD ORDER THE MEDICATION. AFTER TWO MONTHS IT NEVER CAME. HE KEPT SENDING IN MEDICAL REQUEST AND IN APRIL OF 2013 WAS SEEN BY A NURSE WHO TOLD HIM SHE WOULD ORDER THE MEDICATION. THE INMATE WAS CHARGED FOR THIS. THIS STATEMENT WAS SIGNED AND DATED APRIL 25TH 2013 AND HE HAS STILL NOT RECEIVED THE MEDICATION. EXHIBIT 2-C IS A STATEMENT FROM AN INMATE WHO HAD A BAD COLD AND SENT IN A MEDICAL REQUEST. 2 WEEKS LATER WHEN HE WAS NOT SICK ANYMORE THE NURSE BROUGHT HIM 4 COUGH DROPS AND HE WAS CHARGE FOR GOING TO MEDICAL. EXHIBIT 2-D IS AN INMATE WHO FOR TWO MONTHS HAS SENT IN MEDICAL REQUEST TO SEE THE DOCTOR. 3 WEEKS AGO HE WAS TAKEN TO SEE A NURSE WHO TOOK HIS WEIGHT AND TOLD HIM HE WAS ON THE LIST TO SEE THE DOCTOR. 3 WEEKS LATER ON SIGNING THE STATEMENT ON APRIL 29TH 2013 HE STILL HAS NOT

Claim FourInadequate medical services

- (4) seen the doctor. EXHIBIT 2-E is a medical Request Form. AT THE TOP IS SECTION 1. THIS SECTION IS TO BE COMPLETED BY THE INMATE. AT THE BOTTOM OF SECTION 1 THE PARAGRAPH IN BOLD TYPE STATES; "I UNDERSTAND A CO-PAY OF \$8.00 WILL BE DEDUCTED FROM MY COMMISSARY ACCOUNT. MY REFUSING TO BE SEEN FOR A SCHEDULED VISIT WILL RESULT IN A RVR AND NO REFUND OF THE \$8.00 CO-PAY." (NOTE: SO THIS COURT IS AWARE A RVR IS A RULE VIOLATION REPORT. THE RULE VIOLATION FOR SICK CALL IS RULE # 24 IN THE INMATE HANDBOOK AND CARRIES A PUNISHMENT OF 15 DAYS IN LOCKDOWN.) THE BOTTOM SECTION, SECTION 2 IS FOR MEDICAL TO FILL OUT. AFTER YOU ARE SEEN BY A NURSE OR DOCTOR THE INMATE SIGNS AT THE BOTTOM, THEN THE NURSE CHECKS EITHER THE "SICK CALL CHARGE \$8.00" OR THE "NO SHOW FOR SICK CALL VISIT \$8.00". EITHER WAY YOU'RE BEING CHARGED, 8.00. PLAINTIFF ASSERTS THAT THE MEDICAL STAFF TELLS YOU YOU HAVE TO SIGN THE REQUEST AT THE BOTTOM OF SECTION 2 BEFORE YOU ARE TAKEN TO MEDICAL OTHERWISE YOU WILL BE REFUSED TREATMENT. PETITIONER ALLEGES THAT DR. MICHAEL REDDIX AS "HEALTH ASSURANCE" THREATENS INMATES WITH PUNISHMENT (15 DAYS IN LOCKDOWN) USING THE RAKIN COUNTY JAIL AS THE "ENFORCER" OF THIS PUNISHMENT TO FORCE INMATES TO GO TO SICK CALL WHEN SCHEDULED EVEN IF THEY ARE NOT SICK ANYMORE. THIS COURT HAS SEEN AND READ THE STATEMENTS FROM INMATES, EXHIBITS 2-A THRU 2-D WHICH REFLECTS THAT IT COULD TAKE ANYWHERE FROM 2 WEEKS TO 2 MONTHS TO SEE A DOCTOR OR NURSE. WHEN YOU ASK A NURSE WHAT IS TAKING SO LONG THEY REPLY "THE DOCTOR ONLY COMES TWICE A WEEK AND THEY TAKE THE MOST IMPORTANT CASES FIRST." IN MOST CASES BY THE TIME THE INMATE IS SCHEDULED TO SEE THE NURSE OR DOCTOR THEY ARE NOT SICK ANYMORE. DR. MICHAEL REDDIX AS "HEALTH ASSURANCE" AND THE JAIL BOTH BENEFIT FROM THIS.

Claim FourInadequate Medical Services

(4)

IF IT TAKES 2-3 weeks TO GET TO THE DOCTOR AND THE INMATE IS NOT SICK ANYMORE BUT HAS TO GO TO SICK CALL WHEN SCHEDULED AND THE INMATE DOES NOT NEED MEDICAL TREATMENT OR ANY MEDICINE THEN THE JAIL HAS SAVED MEDICAL COST BUT THE INMATE STILL GETS CHARGED THE \$8.00 FEE. AND IF AN INMATE DOES NOT GO TO MEDICAL WHEN SCHEDULED BECAUSE THEY ARE NOT SICK ANYMORE THEY ARE THREATENED WITH PUNISHMENT AND AGAIN ARE STILL CHARGED THE \$8.00 FEE.

WHEN AN INMATE IS MADE TO SIGN THE MEDICAL REQUEST STATING THAT HE HAS BEEN TO THE NURSE OR DOCTOR, THEN AS IN EXHIBIT 2-C IF IT TAKES 2 weeks FOR THE INMATE TO GET THE MEDICINE AND THEY DO NOT NEED IT ANYMORE THEY STILL GET CHARGED THE \$8.00 FEE.

ALL COMPANIES ARE IN BUSINESS TO MAKE MONEY. DR. MICHAEL REDDIX OF "HEALTH ASSURANCE" IS IN BUSINESS TO MAKE MONEY BY SAVING THE JAIL MONEY ON MEDICAL EXPENSES. DR. MICHAEL REDDIX TRIED TO CUT MEDICAL EXPENSES BY HIRING UNDERQUALIFIED STAFF WHO PROVED TO BE SO INCOMPETENT THEY ALL HAD TO BE FIRED.

THE LIVES OF THE INMATES ARE IN THEIR HANDS

PLAINTIFF ALLEGES THAT IT HAS TO BE SOME KIND OF CONFLICT OF INTEREST FOR DR. MICHAEL REDDIX TO OWN THE HEALTH PROVIDER AND TO PERSONALLY TREAT INMATES WHEN HIS GOAL IS TO CUT MEDICAL COST. PLAINTIFF IS MAKING THIS ENTRY ON MAY 1 2013.

PLAINTIFF IS SUBMITTING ANOTHER STATEMENT FROM ANOTHER INMATE, EXHIBIT 2-E. THIS INMATE WAS PUT ON BLOOD PRESSURE MEDICINE AND WAS HAVING HIS BLOOD PRESSURE CHECKED AT LEAST ONCE A WEEK.

THEN MEDICAL JUST STOPPED TAKING IT ANYMORE. AFTER TALKING TO THE MEDICAL OFFICER HE WAS INFORMED THAT ONCE AGAIN THERE WAS GOING TO BE A CHANGE IN MEDICAL STAFF. PLAINTIFF ASSERTS THAT THIS IS A NEVER-ENDING PROCESS HERE. PLAINTIFF ASSERTS THAT SINCE MID FEBRUARY 2013 WHEN ALL THE STAFF WAS FIRED ONLY A FEW OF THE ONES THAT WERE HIRED STILL REMAIN.

CLAIM FOURInadequate medical services

On APRIL 25TH 2013 when PLAINTIFF WAS TAKEN TO medical To See DR. Reddix ABOUT THE M.R.I. AND BACK PAIN DR. Reddix GAVE PLAINTIFF Tylenol FOR THREE weeks. THE LAST DAY OF THE Tylenol WAS ON THE 14TH OF MAY 2013. On MAY 12TH 2013 I Sent in A medical Request To ReFill the medicine And To See THE DOCTOR ABOUT THE BACK PAIN. On MAY 22ND 2013, I WAS TAKEN TO medical. THE DOCTOR I SAW WAS NEW HE SAID IT WAS HIS FIRST TIME, THERE WAS ALSO A NEW NURSE, I DID NOT GET EITHER ONES NAME. I HAD TO EXPLAINE TO THE DOCTOR ABOUT MY BACK PROBLEMS AND THE RUPTURED DISC AND THAT I COULD NOT ALWAYS CONTROL MY BOWLES AND I HAD CONSTANT HEMMORRHOIDS AND BLEEDING BECAUSE OF THIS, AND THE BACK PAIN. He looked in my medical Record And could NOT Find the M.R.I. REPORT.

I Told Him THAT LT. Ben Blaine HAD Read IT TO me AND ALSO DR. Reddix Read IT TO me AND IT WAS IN MY RECORD, ~~HE~~ I ASKED To See A neurosurgeon AND He SAID He would TALK TO LT. Blaine.

THE JAIL HAS CHANGED medical PROVIDERS, I ASSUME DR. MICHAEL Reddix IS NO LONGER HERE AT THE JAIL. NURSE KATIE MINOR AND MRS. LAVERN COLLUM ARE STILL WORKING HERE. AGAIN IN MID TO THE end OF FEBRUARY 2013 LAVERN COLLUM THE medical ADMINISTRATOR FIRED THE ENTIRE STAFF OF NURSES EXCEPT NURSE KATIE MINOR. THEN MRS. COLLUM QUIT THE medical DEPARTMENT AND BECAME A GUARD.

NOW IN MAY OF 2013 THE medical PROVIDER "HEALTH ASSURANCE" OWNED BY DR. MICHAEL Reddix HAS BEEN REPLACED AND MRS. LAVERN COLLUM IS AGAIN WORKING IN THE medical DEPARTMENT. THE OFFICER I TALKED TO ABOUT THIS SAID THE JAIL LET GO "HEALTH ASSURANCE LLC" BECAUSE THERE WERE TOO MANY PROBLEMS WITH THE PROVIDER.

CLAIM FOUR

INADEQUATE MEDICAL SERVICES

ON MAY 29, 2013 AFTER I HAD STOMACH PAINS FOR OVER A DAY I STARTED THROWING UP BLOOD. THE OTHER INMATES CALLED FOR THE OFFICER WHO CALLED FOR THE NURSE AFTER SEEING THE BLOOD.

THE NURSE CAME AND SAW IT AND SAID HE WOULD GET ME TO THE DOCTOR. ON MAY 31, 2013 THE DOCTOR SAW ME, I AGAIN TOLD HIM I HAVE LOST CONTROL OF MY BOWELS FOR THE LAST FOUR MONTHS AND THIS IS CAUSING SEVERE HEMORRHOIDS AND BLEEDING. I TOLD HIM THAT FOR THE LAST FIVE WEEKS I HAVE HAD CONSTANT BLEEDING. THE DOCTOR SAID HE WOULD GET ME TO THE HOSPITAL FOR A COLONOSCOPE.

THIS DOCTOR ALSO STATED THAT LT. BEN BLAINE REFUSES TO AUTHORIZE FOR ME TO SEE A NEUROSURGEON. ON JUNE 2 2013 I WROTE LT. BLAINE ASKING HIM TO GET ME TO A NEUROSURGEON AND TO APPROVE THE DOCTOR TO GET ME TO THE HOSPITAL, EXHIBIT 1-0. ON JUNE 4TH 2013, AT MY APPEAL HEARING (DISCUSSED IN CLAIM THREE) I WAS TOLD BY THE SHERIFF'S DEPT. ATTORNEY, CAPT. THOMASON AND LT. BLAINE THAT THEY WOULD SEE THE DOCTOR WITH ME TO DISCUSS ANY FURTHER MEDICAL TREATMENT. TODAY IS JUNE 6TH 2013 AND I AM MAILING THIS COMPLAINT. LT. BLAINE IS TAKING ME TO SEE THE DOCTOR THIS AFTERNOON.

THIS IS TO AFFIRM THAT THE Below Signed Inmates, upon Being Booked INTO THE Rankin County Jail were Taken To medical FOR A INTAKE SCREENING. EACH OF THESE INMATES were Given A T.B. Test And none OF THESE INMATES were EVER checked FOR A Result OF THIS TEST.

	NAME (PRINT)	NAME (SIGN)	ID #
①	James Kendall	James Kendall	1007494
②	Steven Riddle	Sta Riddle	1005578
③	Steven Allen	Steven D. Allen	00785
④	Brian Sweeney	Brian Sweeney	42827
⑤	John Bishop	John Bishop	2012080271
⑥	Maurice Forville	Maurice Forville	14053
⑦	Stephen Jones	Stephen Jones	23242
⑧	Dallas Tillman	Dallas Tillman	2011120199
⑨	Robert Wilson	Robert Wilson	1001016
⑩	Perry Shoto	Perry Shoto	1000360
⑪	Paul Goodman	Paul Goodman	1000350
⑫			
⑬			

EXHIBIT 2

4-25-13

I Timothy Rowell, Rankin County Jail ID # 2008100165, STATE THE Following; THAT IN ABOUT THE LAST week OF MARCH, 2013, I SENT A medical Request IN ASKING TO SEE THE DOCTOR ABOUT THE MIGRAINE HEADACHES I GET AND ALSO ABOUT A SOFT DIET, I HAVE NO TEETH. AFTER TWO WEEKS THERE WAS NO RESPONSE. AT MEDICATION CALL I ASKED NURSE KATY MINOR WHEN I AM GOING TO SEE THE DOCTOR, SHE ASKED WHAT'S WRONG, I TOLD HER ABOUT MY MIGRAINE HEADACHES AND THAT I HAVE NO TEETH AND NEED A SOFT DIET. SHE STATED; "WHAT DO YOU EXPECT US TO DO GIVE YOU SOFT FOOD TO EAT AND CANT YOU JUST GUM IT." IN ABOUT THE SECOND WEEK OF APRIL 2013, I AGAIN SENT ANOTHER medical Request IN COMPLAINING OF MY MIGRAINS AND THAT THE FOOD WAS CUTTING MY GUMS, THAT I NEED TO SEE THE DOCTOR. ON APRIL 24TH 2013, I AGAIN SENT IN ANOTHER medical Request. ON THE medical Request FORMS THERE IS A SECTION ON THE BOTTOM HALF THAT STATES "DO NOT WRITE BELOW THIS LINE"

AT THE BOTTOM IT HAS A PLACE FOR THE INMATE TO SIGN WHEN THEY SEE THE DOCTOR, AND THAT THEY WILL BE CHARGED A FEE.

WHEN THE NURSES PICK UP THE REQUEST THEY MAKE YOU SIGN WHERE IT STATES THAT YOU HAVE SEEN THE DOCTOR, IF YOU DONT SIGN THEN THEY TELL YOU YOU WILL NOT SEE THE DOCTOR. I HAVE NOT SEEN THE DOCTOR BUT I HAVE BEEN CHARGED FOR TWO OF THE medical Request.

Timothy Rowell

I DECLARE UNDER PENALTY OF PERJURY THAT THE FORGOING IS TRUE AND CORRECT.

Signed THIS THE 25TH day OF APRIL, 2013

Timothy Rowell

(Pg 29-A)

EXHIBIT 2-A

4-25-13

I Jermaine Willis, Rankin County Jail ID #2011040015 STATE THE Following; THAT I WAS CONFINED IN THIS THE Rankin COUNTY JAIL IN ABOUT THE ~~LAST~~ ^{LAST} week OF OCTOBER OF 2012. I WAS TAKEN TO THE medical DEPT. FOR my INITIAL INTAKE screening ABOUT A week LATER. I ADVISED THE NURSE THAT I HAD A SKIN DISEASE CALLED "TENIA VERSICOLOR". THE nurse Had me see THE Lady DOCTOR THAT WAS THERE. THE lady doctor asked WHAT I use; WHAT medication, Told Her IT WAS "Sodium SOLIFATE lotion," And IT IS THE ONLY medication THAT WORKS ON me. SHE SAID SHE would ORDER IT. I NEVER RECEIVED THE medication SO ON February 18, 2012 I SENT ANOTHER medical REQUEST IN TO see THE doctor. I NEVER RECEIVED A RESPONSE. ON ABOUT MARCH 27TH 2013 I AGAIN SENT A medical REQUEST IN, ON ABOUT APRIL 10TH 2013 I WAS TAKEN TO medical AND SAW A nurse NO doctor. THE nurse ASKED me AGAIN WHAT THE SKIN DISEASE WAS AND WHAT medication I TOOK FOR IT. I TOLD Her. SHE SAID SHE would ORDER IT. AS OF THE DATE OF WRITING THIS STATEMENT, APRIL, 25TH 2013 I STILL HAVE NOT RECEIVED THE medication OR SEEN A DOCTOR BUT I HAVE BEEN CHARGED THE Fee FOR EACH medical REQUEST I SENT IN. THE RESULTS OF NOT HAVING THE medication IS ~~ON~~ THIS SKIN DISEASE IS SPREADING ALL OVER. THE nurses make us sign the medical Request stating we HAVE seen THE DOCTOR.

I declare under Penalty OF PERJURY THAT THE Foregoing IS TRUE AND CORRECT

Signed THIS 25TH day OF APRIL, 2013

Jermaine Willis

pg 29-B

EXHIBIT 2-B

4-25-13

I Robbie Williams, Rankin County Jail ID # 2013020267, STATE THE FOLLOWING; THAT AROUND THE BEGINNING OF MARCH 2013, I HAD A SEVERE COLD, SORE THROAT, SINUS PROBLEMS AND EAR ACHE'S. I FILLED OUT A MEDICAL REQUEST TO SEE THE DOCTOR TO GET SOME HELP.

TWO WEEKS WENT BY AND I WAS NOT SICK ANYMORE WHEN THE NURSE CALLED ME TO THE DOOR AT MEDICATION CALL AND TOLD ME I HAD COUGH DROPS. I RECEIVED A TOTAL OF 4 COUGH DROPS. WHEN YOU TURN IN THE MEDICAL REQUEST THE NURSES TELL YOU YOU HAVE TO SIGN THE REQUEST STATING THAT YOU HAVE SEEN THE DOCTOR OR YOU WILL BE DENIED MEDICAL HELP. I WAS CHARGED THE \$ 8.00 FOR SEEING THE DOCTOR WHEN I DID NOT. OR WAS CHARGED FOR 4 COUGH DROPS WHEN I DID NOT NEED THEM TWO WEEKS AFTER I ASKED FOR HELP

Robbie Williams

I DECLARE UNDER PENALTY OF PERJURY THAT THE FORGOING IS TRUE AND CORRECT.

Signed THIS THE 25TH DAY OF APRIL, 2013.

Robbie Williams

Pg. 29-C

EXHIBIT 2-C

4-29-13

I Michael Hodges, Rankin County Jail ID #19781
STATE THE Following; THAT FOR THE LAST TWO MONTHS I HAVE
BEEN SUBMITTING medical Request TO SEE THE DOCTOR ABOUT
my weight loss. ABOUT 3 weeks ago I WAS FINALLY CALLED
TO medical. I ONLY SAW A NURSE, SHE TOOK my weight AND
TOLD me SHE WOULD PUT me ON THE list TO SEE THE DOCTOR AND
TAKE BLOOD SAMPLES. I WAS CHARGED FOR THIS, I HAVE STILL
NOT BEEN CALLED TO SEE THE DOCTOR

Michael 2. Hodges

I DECLARE UNDER PENALTY OF PERJURY THAT THE FORGOING
IS TRUE AND CORRECT,

Signed THIS THE 29TH day OF APRIL, 2013

Michael 2. Hodges

Pg 29-D

EXHIBIT 2-D

**RANKIN COUNTY DETENTION CENTER
HEALTH ASSURANCE LLC
MEDICAL SERVICES REQUEST FORM**

April 2013

Received by Medical

Section 1. To be completed by the inmate
Type of Request (mark with "X")

_____ Medical _____ Dental _____ Psych _____ Medication Refill

Inmate Name _____ Date of Birth _____ ID Number _____

Date _____ Location (Facility, Bldg) _____ SSN _____

Do you have any allergies to medication? If yes, please list the drug(s) _____

Service Request (To better serve you, please be as specific as possible) _____

How long have you had this problem? _____ Please list all medications you are taking _____

What is your doctor's name? _____

What is your pharmacy name & location? _____

I understand a CO-Pay of \$8.00 will be deducted from my commissary account. My refusing to be seen for a scheduled visit will result in an RVR and no refund of the \$8.00 co-pay.

Inmate Signature _____ ID Number _____

Section 2. Medical Services

_____ Weight _____ Temp _____ B/P _____ Pulse _____ Resp. _____ O2Sat _____
Subjective _____

Objective (if more space is needed, please use progress note) _____

Assessment _____

Plan _____

Referral to: Mid Level _____ Physician _____ Dental _____ Mental Health _____ NA _____

Signature of Inmate _____

Signature of Medical Personnel _____

Date _____

Section 3: Co- Pay. (Mark appropriate box with X)

_____ Sick Call Charge: (Inmate initiated non-emergency visit for Medical, dental, or Mental Health \$ 8.00)

_____ No show for Sick Call Visit: (\$8.00)

pg 29-E

EXHIBIT 2-E

MAY 1, 2013

I ROBERT WILSON, RANKIN COUNTY JAIL ID # 1001016
STATE THE FOLLOWING; THAT I WAS INCARCERATED IN THIS
JAIL ON OCTOBER 1, 2012. THAT ABOUT NOVEMBER 10 2012
I WAS TAKEN TO CROSSGATES HOSPITAL'S EMERGENCY ROOM
WITH CHEST PAINS WHERE I WAS KEPT OVERNIGHT. AFTER RETURNING
TO THE JAIL THE DOCTOR PUT ME ON TWO BLOOD PRESSURE MEDICINES.
THEY ALSO GOT ME EVERY WEEK AND CHECKED MY BLOOD PRESSURE.
AFTER A COUPLE OF MONTHS I STARTED COMPLAINING THAT I THOUGHT
THE MEDICINE WAS MAKING ME SICK. WHEN I TOLD ONE OF THE
NURSES ABOUT IT SHE TOLD ME TO FILL OUT A MEDICAL REQUEST.
ABOUT THE END OF MARCH THEY STOPPED TAKING MY BLOOD
PRESSURE. TODAY IS MAY 1 2013, AND I WAS ABLE TO TALK TO
OFFICER CONNIE WHO IS THE OFFICER WHO ESCORTS THE NURSES
AROUND WHEN THEY PASS OUT MEDICATION. SHE IS ALSO THE
OFFICER WHO GETS INMATES FROM THEIR CELLS AND TAKE'S
THEM TO MEDICAL. SHE WOULD GET ME EVERY WEEK AND TAKE
ME TO GET MY BLOOD PRESSURE CHECKED. I ASKED HER IF SHE
KNEW WHY I WAS NOT GETTING MY BLOOD PRESSURE CHECKED
ANYMORE, SHE SAID SHE WOULD TRY TO FIND OUT AND WOULD
MENTION THIS TO MEDICAL. SHE THEN STATED THAT THEY ARE
AGAIN CHANGING MEDICAL STAFF AND THAT THINGS SHOULD
BE RUNNING SMOOTH AGAIN SOON.

Robert Wilson

I declare under Penalty of PERJURY THAT THE
FORGOING IS TRUE AND CORRECT.

Signed THIS THE 1ST DAY OF MAY 2013. Robert Wilson

Pg 29-FEXHIBIT-2-F

page 1 of 8

Claim Five

DENIAL OF ACCESS TO THE COURTS, INADEQUATE legal ASSISTANCE PROGRAM.

- (5) PLAINTIFF STATES AT THIS TIME THAT CLAIM THREE (Inadequate grievance Procedure) AND THIS CLAIM, CLAIM FIVE, RUN PARALLEL WITH EACH OTHER. AFTER ONE MONTH OF BEING IGNORED BY THE JAIL ADMINISTRATION (CLAIM THREE) AND BEING REFUSED medical HELP (CLAIM FOUR) AFTER BEING INJURED BY A JAIL OFFICER (CLAIM TWO), PLAINTIFF WHO HAS NO FAMILY AND WHO WAS HOMELESS AT THE TIME OF HIS ARREST, WHICH STARTED THIS WHOLE PROCESS (CLAIM ONE) HAD TO SELL HIS FOOD (BAKED CHICKEN THE BEST MEAL HERE) TO OBTAIN A STAMPED envelope. ANOTHER INMATE WHEN HE CALLED HOME ASK HIS PARENTS FOR THE ADDRESS TO THE DISTRICT COURT CLERK FOR ME, WHEN I WROTE THE DISTRICT COURT CLERK I TOLD HER/HIM ABOUT THE PROBLEMS I WAS HAVING HERE. THE CLERK SENT ME EXTRA FORMS, SEE EXHIBIT 5, AND TOLD ME TO HANDCOPY THEM IF NEED BE. AFTER INITIATING THIS COMPLAINT, ON MARCH 4TH 2013 I ASKED A GUARD WHO DO I SEND THE INMATE ACCOUNT STATEMENT TO HAVE IT FILLED OUT? HE SAID HE DID NOT KNOW BUT HE WOULD TAKE IT AND TRY TO FIND OUT. HE ASKED WHAT IT WAS FOR AND I TOLD HIM A LAWSUIT. 20 MINUTES LATER I WAS IN LT. BEN BLAINE'S OFFICE. AFTER TWO MONTHS OF REPEATEDLY WRITING LETTERS WITH NO RESPONSE, IT TOOK TELLING A GUARD I WAS FILING A LAWSUIT TO GET SEEN. AT THIS TIME IS WHEN LT. BEN BLAINE TOLD ME THAT HE WOULD HANDLE THE GRIEVANCE AND TO WRITE HIM IF AND WHEN I NEEDED legal HELP. LT. BEN BLAINE GAVE ME ONE STAMPED envelope (~~envelope~~) AND SOME WRITING PAPER. AGAIN PLAINTIFF REITERATES THAT ALMOST EVERYTHING HE COULD WRITE IN THIS CLAIM, CLAIM FIVE IS COVERED IN CLAIM THREE SINCE THE LETTERS HE WROTE TO LT. BEN BLAINE BOTH CONCERNED HIS GRIEVANCE AND REQUEST FOR legal ASSISTANCE. PLAINTIFF WILL TRY NOT TO BE REPETITIVE AND WILL TRY TO BE BRIEF IN THIS CLAIM.

page 2 of 8

Claim Five

DENIAL OF ACCESS TO THE COURTS, INADEQUATE LEGAL ASSISTANCE PROGRAM

(5) PLAINTIFF ASSERTS THAT THE RANKIN COUNTY JAIL DOES NOT HAVE A LEGAL ASSISTANCE PROGRAM AT ALL. IN SUPPORT OF THIS ASSERTATION I WILL QUOTE FROM THE JAIL INMATE HANDBOOK, FROM PAGE-4 TITLED; "SEGREGATED INMATES PROCEDURE TO ACCESS COURTS."

"THEY WILL BE INFORMED TO WRITE THE COURTS, THE COURT WILL SEE THAT THEY RECEIVE ADEQUATE LEGAL ASSISTANCE DEALING WITH THEIR CASE AND WILL ENSURE THEY HAVE LEGAL COUNSEL AS WELL AS LEGAL MATERIALS PROVIDED," ("PUBLIC DEFENDER")."

PLAINTIFF ASSERTS THAT THIS PARAGRAPH ADVISES INMATES AT THE JAIL THAT THE JAIL WILL NOT PROVIDE; ADDRESSES TO THE COURT HERE OR ELSEWHERE, TO THE SUPREME COURT OR COURT OF APPEALS, THE MISSISSIPPI BAR ASSOCIATION, THE MISSISSIPPI ETHICS COMMISSION, THE A.C.H.U. THE N.A.A.C.P. OR LAW FIRMS WHEN REQUESTED. THIS JAIL DOES NOT PROVIDE LIMITED ACCESS TO PRE-TRIAL CONFINEMENT RESEARCH, CASE CITES, ACCESS TO A LAW LIBRARY OR PROVIDE EXAMPLES OF MOTIONS FOR AN INMATE TO FILE INTO COURT, SENTENCING GUIDELINES OR STATUTES. THIS JAIL WILL NOT MAKE COPIES OF AN INMATES LEGAL DOCUMENTS OR MAIL HIS LEGAL WORK. THIS JAIL DOES PROVIDE AN INMATE WITH THREE STAMPS A WEEK. THERE ARE SOME INMATES THAT HAVE LEGAL MATTERS PENDING IN OTHER JURISDICTIONS OR THEY ARE HERE ON A COURT ORDER AND HAVE LEGAL MATTERS ELSEWHERE AND THIS JAIL DENIES THEM AND EVERY INMATE THEIR RIGHT TO ACCESS THE COURT. THIS JAIL ADVISES INMATES TO WRITE THE COURT, BUT DOES NOT GIVE YOU THE ADDRESS OR WHO TO WRITE TO. THIS JAIL INSINUATES THAT THE (PUBLIC DEFENDER) WILL BE THE ONE TO HELP YOU. IN RANKIN COUNTY CIRCUIT COURT YOU WILL

Page 3 of 8

CLAIM FIVE

DENIAL OF ACCESS TO THE COURTS, INADEQUATE LEGAL ASSISTANT PROGRAM

- (5) NOT BE APPOINTED A PUBLIC DEFENDER UNTIL SOMETIME AFTER YOU ARE ARRAINGMENT. YOU ARE NOT ARRAINGED UNTIL YOU ARE INDICTED. THERE ARE INMATES HERE THAT HAVE BEEN HERE 8 MONTHS AND STILL HAVE NOT BEEN INDICTED. IN MY CASE I WAS ARRESTED ON DECEMBER 23, 2012 AND I WILL NOT SPEAK TO MY PUBLIC DEFENDER UNTIL JULY 31, 2013, AND MY COURT DATE IS AUGUST 5TH, 2013. THIS SUS 1983 PRISONER COMPLAINT IS FEDERAL. ON MARCH 24TH 2013, AFTER REPEATED ATTEMPS AND LETTERS TO LT. BEN BLAINE TRYING TO GET ADDRESSES TO COURTS AND COPIES AND MAIL SERVICE TO THE COURT I WROTE THE DISTRICT COURT CLERK COMPLAINING ABOUT THIS JAIL TRYING TO HINDER ME WITH THIS COMPLAINT AND REFUSING TO RETURN THE INMATE ACCOUNT STATEMENT. THE DISTRICT COURT CLERK RESPONDED THAT, "THIS OFFICE CANNOT GIVE LEGAL ADVICE", EXHIBIT 5-A. THIS JAIL DOES NOT PROVIDE ANY INFORMATION OR ASSISTANCE ON HOW TO ACCESS FEDERAL COURT. THIS JAIL DOES NOT WANT AN INMATE TO KNOW HOW TO ACCESS FEDERAL COURT, OR CIRCUIT COURT FOR THAT MATTER. ON MARCH 4TH 2013, WHEN I SENT THE INMATE ACCOUNT STATEMENT WITH THE OFFICER AND THEN WAS CALLED UP TO SEE LT. BEN BLAINE I ASKED HIM FOR ADDRESSES TO DISTRICT COURT, CIRCUIT COURT, THE DISTRICT ATTORNEY AND CIRCUIT COURT CLERK AND A LAW FIRM. HE ALSO TOOK THE INMATE ACCOUNT STATEMENT AND SAID HE WOULD GIVE IT TO THEIR LEGAL COUNSEL AND FILL IT OUT AND RETURN IT TO ME. AS OF TODAY'S DATE MAY 2, 2013 LT. BEN BLAINE HAS NOT SENT ME ANY OF THE ADDRESSES OR THE ACCOUNT STATEMENT FOR THE PRISONER COMPLAINT. I ASKED LT. BEN BLAINE WHO DO I NEED TO TALK TO ABOUT MY GRIEVANCE HE SAID HE WOULD HANDLE IT. I ~~AM~~ HAVE NOT RECEIVED AN ANSWER ON IT EITHER. I ALSO ASKED WHO DO I NEED TO TALK TO ABOUT COPYING AND MAILING THIS COMPLAINT HE TOLD ME TO WRITE THE COURT. I ADVISED HIM THAT

CLAIM FIVEDENIAL OF ACCESS TO THE COURTS, INADEQUATE LEGAL ASSISTANCE PROGRAM

- (5) THIS WAS A FEDERAL COMPLAINT HE THEN SAID I COULD WRITE HIM. I STARTED SENDING LETTERS TO INITIATE THE GRIEVANCE PROCESS AND ASKING ABOUT LEGAL SERVICES AND GETTING THE ADDRESS FOR THE DISTRICT COURT CLERK ON DECEMBER 27TH 2012 AND ON THE FOLLOWING¹, JAN 4TH 2013, JAN 14TH 2013, JAN 25TH 2013, AND FEB 13TH 2013 ALL WITH NO RESPONSES. ON FEB 24TH 2013 AFTER BEING ADVISED BY A LT. ROOSEVELT ROSS WHO GOT ME A GRIEVANCE FORM AND TOLD ME TO SEND IT TO LT. BEN BLAINE, I FILLED IT OUT AND TOLD HIM ABOUT THE ASSAULT, MEDICAL REFUSING TO SEE ME, AND THAT I NEEDED THE ADDRESS TO DISTRICT COURT AND A PRISONER COMPLAINT FORM, COPIES AND MAIL SERVICES AND THE INMATE ACCOUNT STATEMENT FILLED OUT, SEE EXHIBIT ONE. HE DID GET ME TO MEDICAL, AFTER THE VISIT ON MARCH 4 2013, BUT HAS NOT DONE ANYTHING ELSE SINCE. ON MARCH 17 2013 I WROTE TO LT. BEN BLAINE AND SHERIFF BRYAN BAILEY, SEE EXHIBIT 1-A. ON MARCH 30 2013 I AGAIN WROTE SHERIFF BAILEY AND LT. BLAINE, SEE EXHIBITS 1-B AND 1-C. ON APRIL 1 2013 LT. BLAINE CALLED ME TO HIS OFFICE AND TOLD ME THAT HE STILL DID NOT HAVE THE ACCOUNT STATEMENT AND THAT HE WOULD NOT MAKE COPIES OF OR MAIL MY COMPLAINT TO COURT. * ON APRIL 5 2013 I WROTE TO KEEFE COMMISARY SERVICES ASKING IF THEY COULD HELP ME WITH THE ACCOUNT STATEMENT EXHIBIT-3. THEY DID GET IT FILLED OUT AND RETURNED IT TO ME WITH MY LETTER I SENT THEM "STAMPED" RECEIVED, SEE EXHIBIT 3-A. ON APRIL 7TH 2013 I AGAIN WROTE LT. BLAINE ASKING FOR THE ACCOUNT SHEET EXHIBIT 1-D NO RESPONSE. ON APRIL 16 2013 I AGAIN WROTE TO LT. BLAINE ASKING FOR LEGAL MATERIALS, ADDRESSES TO THE COURTS AND TO A LAW FIRM, EXHIBIT 1-E, NO RESPONSE. ON APRIL 23 2013, I AGAIN WROTE LT. BLAINE ABOUT THE ADDRESSES I NEEDED EXHIBIT 1-F AGAIN NO RESPONSE.

CLAIM FIVE

DENIAL OF ACCESS TO THE COURTS, INADEQUATE LEGAL ASSISTANCE PROGRAM

- (5) ON APRIL 28TH 2013, I AGAIN WROTE TO LT. BLAINE ASKING FOR THE ADDRESSES TO THE COURTS, THE LAW FIRM AND THAT I NEEDED COPIES AND MAIL SERVICE TO THE DISTRICT COURT, EXHIBIT I-G.

ON APRIL 12 2013 INMATE RONNIE CROWSON WAS RETURNED TO THE RANKIN COUNTY JAIL ON A COURT ORDER TO APPEAR IN COURT ON APRIL 15 2013. UPON BEING ADDED INTO THE JAIL THE OFFICERS TOOK HIS LEGAL WORK AND SAID HE COULD NOT HAVE IT. HE CAME INTO THE JAIL ON FRIDAY THE 12TH AND WENT TO COURT ON MONDAY THE 15TH.

INMATE CROWSON WAS BEING SENTENCED ON MONDAY FOR THE CHARGE OF BUSINESS BURGLARY. PART OF THE LEGAL WORK THEY TOOK FROM HIM WAS A LETTER FROM THE BUSINESS HE BROKE INTO, THE LETTER WAS FROM THE OWNER WHO STATED THAT MR. CROWSON HAS ALREADY MADE FULL RESTITUTION. THIS LETTER WAS MITIGATING EVIDENCE THAT WOULD POSSIBLY HELP AT THE SENTENCING HEARING. HIS STATEMENT IS EXHIBIT 4. THIS SHOULD HELP SHOW THE DELIBERATE INDIFFERENCE THIS JAIL HAS FOR AN INMATES NEED FOR HIS LEGAL WORK.

- (* NOTE * I WROTE TO KEEFE COMMISARY SERVICES FOR AN INMATE ACCOUNT STATEMENT MY HANDWRITTEN COPY IS EXHIBIT 3, ON APRIL 5, 2013. ON APRIL 25 2013 I RECEIVED THE STATEMENT WITH A STAMPED COPY OF THE LETTER I SENT THEM EXHIBIT 3-A) ON MAY 5 2013 I AGAIN WROTE LT. BLAINE ASKING FOR THE ADDRESSES FOR THE COURT HERE AND A LAW FIRM. I HAVE BEEN ASKING FOR THESE ADDRESSES FOR OVER 3 MONTHS AND HAVE BEEN REFUSE THEM, THE LETTER ON MAY 5 2013 IS EXHIBIT I-H, ON MAY 13TH 2013 I AGAIN WROTE TO LT. BLAINE ASKING FOR MAIL SERVICE, COPIES AND ADDRESSES TO THE COURT, SEE EXHIBIT I-I. ALSO ON MAY 13, 2013 I SENT A MOTION TO COMPEL OR SHOW CAUSE TO THE RANKIN COUNTY CIRCUIT COURT ASKING THE COURT TO COPY AND MAIL MY COMPLAINT OR TO ORDER

Page 6 of 8

CLAIM FIVEDENIAL OF ACCESS TO THE COURTS, INADEQUATE LEGAL ASSISTANCE PROGRAM

- (5) THE JAIL ADMINISTRATOR TO COPY AND MAIL MY COMPLAINT. THIS MOTION IS EXHIBIT-6 AND IS 5 PAGES. ON MAY 20, 2013, I WROTE TO THE SHERIFF, MR. BRYAN BAILEY, ASKING FOR COPIES AND MAIL SERVICE AND COMPLAINING ABOUT LT. BLAINE REFUSING TO HELP ME, EXHIBIT I-J. I ALSO WROTE AGAIN TO LT. BLAINE ASKING FOR COPIES AND MAIL SERVICE, EXHIBIT I-K. SINCE JANUARY OF 2013, LT. BEN BLAINE HAS REFUSED TO SEND ME ANY ADDRESSES TO THE COURTS I HAVE ASKED FOR, THE ADDRESSES I DID GET WERE FROM ANOTHER INMATE. LT. BEN BLAINE HAS ALSO TOLD ME VERBALLY THAT HE WOULD NOT COPY OR MAIL MY COMPLAINT TO COURT. LT. BLAINE SINCE FINDING OUT FROM THE M.R.I. THAT I DID HAVE A BACK INJURY HAS IGNORED EVERY LETTER, COMPLAINT AND GRIEVANCE I HAVE SENT. LT. BLAINE TOOK THE INMATE ACCOUNT STATEMENT ON MARCH 4TH 2013 AND TO THIS DATE, MAY 23, 2013 HAS NEVER RETURNED IT. ON MAY 27, 2013 I AGAIN WROTE TO LT. BLAINE ASKING FOR THE ADDRESSES TO THE COURT AND COPIES AND MAIL SERVICE TO MAIL MY COMPLAINT TO THE DISTRICT COURT. SEE EXHIBIT I-N. ON MAY 15, 2013 PLAINTIFF SENT A MOTION TO THE DISTRICT COURT CLERK ASKING THE COURT TO ORDER THE JAIL TO COPY AND MAIL MY COMPLAINT. IT WAS SENT BACK BECAUSE I DO NOT HAVE A CIVIL ACTION PENDING, LETTER FROM THE DISTRICT CLERK IS EXHIBIT-~~6-J~~ 6-J.
- ON JUNE 2 2013 I AGAIN WROTE LT. BLAINE FOR COPIES AND MAIL SERVICE TO THE DISTRICT COURT. EXHIBIT I-O. ON JUNE 3 2013 ON THE ~~2~~ P.M. SHIFT I WAS CALLED TO SIGN FOR A LEGAL LETTER. THIS LETTER WAS FROM AN ATTORNEY THAT MY CHURCH FAMILY ASK TO SEE IF HE WOULD HELP ME WITH MY BACK INJURY AND/OR THIS COMPLAINT.

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CLAIM FIVE

DENIAL OF ACCESS TO THE COURTS, INADEQUATE LEGAL ASSISTANCE PROGRAM

(5)

THIS LETTER IS FROM MR. ROCKY WILKINS, "PERSONAL INJURY LAW"
 THIS LETTER WAS CLEARLY MARKED "ATTORNEY CLIENT PRIVILEGE", THIS
 LETTER WAS "REJECTED" BY THE RANKIN COUNTY JAIL FACILITY AS
 IS OBVIOUS BY THE STAMP ON THE ENVELOPE, THIS LETTER WAS ALSO OPENED.

THE ENVELOPE IS EXHIBIT - 7. ON JUNE 3 2013, I SENT A
 MOTION TO THE DISTRICT COURT AFTER RECEIVING A CIVIL ACTION NUMBER
 ASKING THE COURT TO ORDER THE JAIL TO COPY AND MAIL THE REST OF
 MY COMPLAINTS. I WAS ONLY ABLE TO SEND ONE COPY TO THE COURT.
 I COULD NOT SEND ANY COPIES FOR THE DEFENDANTS OR THE 63 PAGES
 OF FACTS, NAMES AND DATES. I RECEIVED THE LETTER FROM THE DISTRICT
 COURT CLERK ON JUNE 3RD 2013. ON JUNE 4TH 2013 I ATTENDED
 AN APPEAL HEARING AS DISCUSSED IN CLAIM THREE, AND THE ATTORNEY
 ASKED LT. BEN BLAINE TO AT MY REQUEST TO COPY AND MAIL THE
 COMPLAINT TO THE DISTRICT COURT. TODAY IS JUNE 5TH 2013 AND
 I AM WRITING TO LT. BLAINE ASKING HIM TO ~~COMPLAINT~~ COPY AND
 MAIL ~~MY~~ COMPLAINT TO DISTRICT COURT, SEE EXHIBIT ONE - P.

TODAY IS JUNE 7TH 2013 AND AS OF THIS DATE LT. BEN BLAINE
 HAS REFUSED TO GET ME ANY OF THE ADDRESSES I HAVE REPEATEDLY ASKED
 FOR, TO THE DISTRICT COURT, RANKIN COUNTY CIRCUIT COURT, CIRCUIT COURT
 CLERK AND THE DISTRICT ATTORNEY, OR THE LAW FIRM I REQUESTED AND WILL
 NOT PROVIDE ME WITH THE MS. RULES OF CIVIL PROCEDURE. LT. BLAINE TOOK THE
 INMATE ACCOUNT SHEET ON MARCH 4TH 2013 AND SAID HE WOULD GET IT FILLED
 OUT BUT HE NEVER HAS AND WHEN I COULD ASK HIM ABOUT IT HE SAID
 HE WOULD CHECK ON IT, ONLY AT THE APPEAL HEARING DID THE SHERIFFS
 ATTORNEY SAY THAT THEY WERE NOT RESPONSIBLE FOR FILING IT OUT. WHY
 DID LT. BLAINE NOT INFORM ME OF THIS SOONER.

page 8 of 8

Claim Five

DENIAL OF ACCESS TO THE COURTS, INADEQUATE legal ASSISTANCE PROGRAM

(5)

Handwritten Copy

To Keefe

4-5-13

I Am Filing A MOTION IN FEDERAL COURT
And I need your Help. Could you Please Fill out
The enclosed form And RETURN A COPY TO ME.

IT IS AN ACCOUNT STATEMENT, I AM PROCEEDING
IN FORMA PAUPERIS AND DO NOT HAVE ANY FUNDS
TO PAY.

Please would you Help me

I AM AT THE

Rankin County Jail

Steven Riddle

221 N. Timber St

Brandon, MS. 39042

Booking # 1005578

Rankin County Jail # 2012120381

D.O.B.

10-30-58

Thank you very much

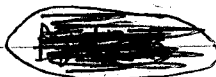
St. Riddle

*

EXHIBIT THREE

*

Pg 36



To Reefe

4-5-13

I Am Filing A MOTION IN FEDERAL COURT
And I need your HELP. Could you Please Fill out
THE enclosed Form And RETURN A COPY TO me.

IT IS A ACCOUNT STATEMENT, I AM PROCEEDING
IN FORMA PAUPERIS AND DO NOT HAVE THE FUNDS TO PAY.
Please would you Help me.

I AM AT THE

Rankin County Jail

Steven Riddle
221 N. Timber, ST
BRANDON, MS. 39042

Booking # 1005578
Rankin County Jail # 2012120381
D.O.B. 10-30-58

THANK YOU VERY MUCH

Stu Riddle

* EXHIBIT 3-A *

Received 4-25-13

(pg 36-A)

APR 11 2013

4-13-2013

I, Ronnie Crowson JR, MS. DEPT. OF CORRECTIONS ID # 114086, WAS BROUGHT BACK TO THE RANKIN COUNTY JAIL FROM THE KEMPER COUNTY COMMUNITY WORK CENTER (C.W.C.) ON FRIDAY THE 12TH DAY OF APRIL, 2013 ON A COURT ORDER FROM THE CIRCUIT COURT OF RANKIN, COUNTY MS, TO APPEAR IN COURT ON MONDAY THE 15TH DAY OF APRIL, 2013 TO BE SENTENCED ON THE CHARGE OF COMMERCIAL BURGLARY. UPON ARRIVAL AT THE RANKIN COUNTY JAIL THE OFFICER WHO PROCESSED ME IN TOOK MY LEGAL WORK FROM ME AND TOLD ME I WAS NOT ALLOWED TO HAVE IT. I ADVISED THE OFFICER THAT THIS LEGAL WORK WAS FAVORABLE EVIDENCE THAT I NEEDED TO PRESENT TO THE CIRCUIT COURT JUDGE ON MONDAY THE 15TH AT THE HEARING, AND THAT'S WHY I WAS BROUGHT HERE.

THE OFFICER STATED THAT "IT DID NOT MATTER, THAT I AM NOT GOING TO GET IT". THIS EVIDENCE WAS A RANKIN COUNTY CHANCERY COURT JUDGE'S COURT ORDER APPROVING MY REQUEST TO BE COMMITTED TO WHITFIELD STATE HOSPITAL FOR THE TREATMENT OF DRUG ADDICTION, A LETTER FROM THE OWNER OF THE "MEN'S ROOM" BARBER SHOP IN PEARL, MS (RANKIN, COUNTY) THE BUSINESS I HAD BROKEN INTO STATING THAT I HAD MADE FULL RESTITUTION TO THEM, AND A MOTION. THIS IS MITIGATING EVIDENCE TO PRESENT TO THE JUDGE WHEN HE CONSIDERS THE SENTENCE HE IMPOSES ON ME. I DO NOT UNDERSTAND HOW THIS JAIL CAN VIOLATE MY RIGHT TO HAVE LEGAL WORK. I WILL TESTIFY TO THIS FACT IF NEEDED.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. Signed on this the 13TH day of APRIL, 2013.

Ronnie B. Crowson JR

* EXHIBIT-4 *

(pg 36-B)

Ronnie Crowson JR.

UNITED STATES DISTRICT COURT
OFFICE OF THE CLERK
SOUTHERN DISTRICT OF MISSISSIPPI

MEMORANDUM

TO: STEVEN RIDDLE
RANKIN COUNTY JAIL
221 TIMBER STREET
BRANDON, MISSISSIPPI 39042

DATE: February 28, 2013

FROM: J. T. Noblin, Clerk
by: *Pro Se* Office

RE: Your letter dated February 24, 2013 requesting forms

This memorandum is written in response to your letter requesting forms.

Pursuant to your request, I am enclosing three (3) sets of the complaint form used to file an action pursuant to 42 U.S.C. § 1983 (**conditions of confinement**) which includes a request to proceed *in forma pauperis* if you are unable to pay the \$350.00 filing fee. The instructions for completing the complaint form are on the cover sheet. You must submit for filing the original signed complaint and you are requested to submit a copy for each defendant. If you are unable to have the complaint copied by a machine, you may copy the complaint by handwriting it on the copies I have enclosed. **You will need to retain a copy of the complaint for your records.**

Before completing the forms, be sure to read and follow the instructions carefully. Failure to comply with the instructions may result in your complaint being returned to you. After you have completed the forms, you will need to submit them for filing to Clerk, U. S. District Court, 501 E. Court Street, Suite 2.500, Jackson, Mississippi 39201.

PG 36-C

EXHIBIT 5

UNITED STATES DISTRICT COURT
OFFICE OF THE CLERK
SOUTHERN DISTRICT OF MISSISSIPPI

MEMORANDUM

TO: STEVEN RIDDLE
RANKIN COUNTY JAIL
221 N. TIMBER STREET
BRANDON, MISSISSIPPI 39042

DATE: April 4, 2013

FROM: J. T. Noblin, Clerk
by: *Pro Se* Office

SUBJECT: Your letter dated March 24, 2013

This memorandum is written in response to the receipt of your letter referenced above.

This office cannot give legal advice. You should submit your documents/complaint to this office at 501 E. Court Street, Suite 2.500, Jackson, Mississippi 39201.

EXHIBIT 5-A

Pg 36-D

MAY 13 2013

TO: Rebecca Boyd - CIRCUIT COURT CLERK
P.O. Box 1599 BRANDON, MS. 39042

FROM: Steven Riddle Rankin County Jail
221 N. TIMBER ST BRANDON, MS. 39042

RE: Request To Proceed In FORMA PAUPERIS AND MOTION TO
COMPEL / SHOW CAUSE.

Dear Mrs. Boyd

Enclosed Please Find For Filing my "Request To
Proceed In FORMA PAUPERIS" And my "MOTION TO COMPEL -
SHOW CAUSE". Would you Please File These To Be Heard.
Also Could you Please send me a "STAMPED FILED" COPY
FOR my RECORDS. AS you CAN see I AM INCARCERATED AND
THE JAIL REFUSES TO make COPIES FOR us. Please would you
Help me in THIS MATTER.

THANK you very much.

Steven Riddle

EXHIBIT-6

IN THE CIRCUIT COURT OF RANKIN COUNTY
MISSISSIPPI

Steven Riddle

PETITIONER

VS

CAUSE #

STATE OF MISSISSIPPI

Respondant

MOTION TO COMPEL, MOTION TO SHOW CAUSE

Comes now THE PETITIONER, Steven Riddle, PRO-SE
And BRINGS THIS HIS MOTION TO COMPEL AND /OR HIS MOTION
TO SHOW CAUSE AND MOVES THIS COURT TO GRANT THE RELIEF
PETITIONER SEEKS BASED ON THE FOLLOWING FACTS TO WIT;

I

THAT PETITIONER IS INCARCERATED IN THE RANKIN COUNTY
JAIL AWAITING DISPOSITION OF CHARGES UNDER THE JURISDICTION
OF THE CIRCUIT COURT OF RANKIN COUNTY. THAT BEING INCARCERATED
IN THE RANKIN COUNTY JAIL PETITIONER IS BEING HELD UNDER THE
JURISDICTION OF THE RANKIN COUNTY SHERIFF'S DEPARTMENT,
SHERIFF BRYAN BAILEY AND LT. BEN BLAINE THE JAIL ADMINISTRATOR
AND AS SUCH IS UNDER THE AUTHORITY OF THE RULES ADMINISTERED
BY THE RANKIN COUNTY JAIL.

II

THAT PETITIONER CAN NOT ENTER EXHIBITS IN SUPPORT OF
THIS MOTION BECAUSE THE RANKIN COUNTY JAIL HAS REFUSED

To make copies of PETITIONERS legal work AND HAS REFUSED TO MAIL PETITIONERS legal work TO THE COURTS WHICH IS THE BASIS OF THIS MOTION.

III

THAT PETITIONER ASSERTS THAT HE HAS INITIATED AND COMPLETED A § U.S. 1983 PRISONER COMPLAINT FORM CONTAINING FIVE CLAIMS AGAINST THE RANKIN COUNTY JAIL, WHICH INCLUDE A "EXCESSIVE FORCE CAUSING INJURY" CLAIM A "DENIAL OF ACCESS TO THE COURTS" CLAIM AND AN "INADEQUATE MEDICAL SERVICE" CLAIM.

IV

PETITIONER QUOTE'S FROM THE RANKIN COUNTY JAIL Rules AND REGULATIONS Handbook ON PAGE-3 UNDER "INMATE RIGHTS include" IT STATES; "ACCESS TO COURTS, ATTORNEYS AND legal MATERIALS". ON PAGE-4 TITLED; "SEGREGATED INMATES PROCEDURE TO ACCESS COURTS" IT STATES; "THEY WILL BE INFORMED TO WRITE THE COURT, THE COURT WILL SEE THAT THEY RECEIVE ADEQUATE legal ASSISTANCE DEALING WITH THERE CASE AND WILL ENSURE THEY HAVE legal COUNSEL AS WELL AS legal MATERIALS PROVIDED. (PUBLIC DEFENDER)".

WHEREBY PETITIONER BRINGS THIS MOTION TO THIS COURT.

V

PETITIONER ASSERTS THAT HE HAS REPEATEDLY SENT REQUEST TO LT. BEN BLAINE, THE JAIL ADMINISTRATOR ASKING FOR COPIES

And mail service to the district court. These request are in Petitioner's complaint marked as exhibits 1-C, 1-E, 1-G, 1-H and 1-I. Petitioner asserts that when he was brought to Lt. Ben Blaine's office, Lt. Blaine refused Petitioner's verbal request for copies and mail service to the courts by stating that he would not make copies or mail my complaint.

VII

Petitioner alleges that the Rankin County Jail administrators are deliberately preventing him from filing his complaint into the district court in violation of their own rules and rights that they have given an inmate in their handbook and in violation of the rights afforded to me under the U.S. Constitution.

RELIEF

Wherefore Petitioner prays that this court appoint a circuit court official, in the presence of Petitioner, to make copies of Petitioner's § U.S. 1983 Prisoner Complaint, have it stapled together, sealed in the envelope and mailed to the U.S. District Court Clerk or to compel the jail administrators to copy, staple and seal the complaint in the presence of Petitioner and mail it to the U.S. District Court Clerk, such mail to be mailed "certified mail"

TO HELP ENSURE THAT THE ORIGINAL AND COPIES DO NOT GET
LOST OR TO ORDER THE JAIL ADMINISTRATION TO SHOW CAUSE AS
TO WHY THEY ARE REFUSING TO MAIL PETITIONERS COMPLAINT.

SO SUBMITTED ON THIS THE 13 DAY OF MAY
2013

Steven Riddle

STEVEN RIDDLE PRO-SE
221 N. TIMBER ST
BRANDON, MS, 39042

UNITED STATES DISTRICT COURT
OFFICE OF THE CLERK
SOUTHERN DISTRICT OF MISSISSIPPI

MEMORANDUM

TO: STEVEN RIDDLE
RANKIN COUNTY JAIL
221 N. TIMBER STREET
BRANDON, MISSISSIPPI 39402

DATE: May 20, 2013

FROM: J. T. Noblin, Clerk
by: Pro Se Secretary

SUBJECT: Your documents

This Memorandum is to acknowledge receipt of your documents; however, your documents were not filed and are being returned. You cannot submit a motion without a civil action pending in this court.

In order to commence a civil action in this Court, you must file a complaint. See Federal Rules of Civil Procedure, Rule 3.

I am enclosing a 42 U.S.C. 1983 complaint package.

pg-36-J

EXHIBIT ~~6~~ 6-J

ROCKY WILKINS
PERSONAL INJURY LAW

Post Office Box 2777
Jackson, Mississippi 39207
A Professional Limited Liability Corporation

136
Leah

"REJECTED"
BY: RANKIN COUNTY
JAIL FACILITY



US POSTA
\$ 00.4
MAILED 06/13/2013
031A 0004180645

RETURN TO SENDER

Mr. Steven Riddle, Inmate
Rankin County Jail
221 North Timber Street
Brandon, Mississippi 39042

ATTORNEY CLIENT PRIVILEGE

3804283138 0005

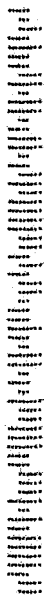


EXHIBIT 7

Page 1 of 6

RELIEF

CLAIM ONE

DENIAL OF FEDERAL OR STATE RIGHT TO make A PHONE CALL

Suspend OFFICER DENISE CRAIG AND OFFICER MITCH HALL FOR THREE DAYS. HAVE OFFICERS DENISE CRAIG AND MITCH HALL ATTEND SENSITIVITY TRAINING TO LEARN HOW TO TREAT HOMELESS PERSONS. HAVE OFFICERS DENISE CRAIG AND MITCH HALL AND THE RANKIN COUNTY SHERIFF'S DEPARTMENT PAY ONLY THE STORAGE FEE'S ON MY TRUCK THAT WAS TOWED FROM THE TIME THAT THEY DENIED ME A PHONE CALL TO THE TIME I WENT TO COURT ON MY INITIAL APPEARANCE AND WAS ALLOWED TO USE THE PHONE WHICH WAS FOURTEEN DAYS AT \$25.00 DOLLARS A DAY. PLACE A MEMORANDUM IN VIEW OF EVERYBODY IN THE BOOKING DEPARTMENT STATING THAT EVERYONE WILL BE ALLOWED A PHONE CALL.

CLAIM TWO

Excessive Force

Suspend OFFICER MITCH HALL FOR THREE DAYS.

HAVE THE SHERIFF REPORT THIS COMPLAINT OF MISTREATMENT TO THE BOARD OF SUPERVISORS AS PER MISS. CODE ANN. 47-1-29.

HAVE THE SHERIFF FILE A MISDEMEANOR CHARGE AGAINST OFFICER MITCH HALL PURSUANT TO MISS. CODE ANN. 47-1-27.

HAVE OFFICER MITCH HALL PAY ME \$15,000 FOR CAUSING MY INJURY. HAVE OFFICER MITCH HALL PAY \$44,000 FOR CORRECTIVE SURGERY ON MY L-5 DISC. HAVE THE RANKIN COUNTY SHERIFF'S DEPARTMENT PAY \$44,000 DOLLARS FOR CORRECTIVE SURGERY ON MY L-5 DISC. HAVE THE RANKIN COUNTY SHERIFFS DEPT. TAKE ME TO A NEUROSURGEON.

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Page 2 of 6

RELIEFClaim THREE
INADEQUATE GRIEVANCE PROCEEDURE

Implement A Grievance Proceedure For The Grievance Process Where Inmates Have Access To The Grievance Form Upon Request. Make It mandatory That Officers Allow Inmates Out Once A Day To Put The Grievance Forms Into The Handmail lock Box. Make It mandatory That The Grievance Is Read Within Five (5) working Days From The Date On The Grievance By The Designated Jail Official. Make It mandatory That The initial First step grievance Shall Be Concluded no more than 30 days From date It is Submitted.

Make It mandatory That The Second And Final step is concluded in no more than Sixty (60) days From The Date It is Submitted. make It mandatory That The Inmate Recieve A "Certificate of Completion" After The Second And Final step is completed.

Have The Jail Re-write And update The Inmate Handbook With The Forgoing Instructions. Plaintiff Ask This Court Or Its Representative To monitor The Implementation And Progress Of This Process. Make All Officers wear Visible Name Tags. Have L.T. Ben Blaine Pay me \$15,000 dollars For Deliberatly Ignoring my Grievance And Pleas For Help For 70 days until I initiated A 42 U.S.C, §1983 Prisoner complaint Form. Have The Rankin County Sheriffs Department Pay \$15,000 dollars For Deliberatly Refusing To up-date The Jail Handbook To Hinder Inmates From Accessing The Grievance Proceedure. The Current Handbook is Dated 2011.

pg 3 of 6

RELIEFCLAIM FOUR

INADEQUATE medical service, Deliberate indifference to medical needs.

HAVE THE RANKIN COUNTY SHERIFF'S DEPARTMENT, SHERIFF BRYAN BAILEY, LT. BEN BLAINE, DR. MICHAEL REDDIX AS "HEALTH ASSURANCE LLC" OR THE CURRENT HEALTH PROVIDER FOR THE JAIL TAKE ME TO A NEUROSURGEON, PREFERABLY THE ONE WHO DID MY MOST RECENT BACK SURGERY AND KNOWS MY BACK, DR. BEN KERR OF THE JACKSON NEUROSURGERY CLINIC AT ST. DOMINICS IN JACKSON, MS.

HAVE THE RANKIN COUNTY SHERIFF'S DEPARTMENT PAY FOR THE CORRECTIVE SURGERY ON MY L-5 DISC OR \$44,000 DOLLARS WHICH IS WHAT THE LAST SURGERY COST. HAVE THE RANKIN COUNTY SHERIFF'S DEPARTMENT AND/OR SHERIFF BRYAN BAILEY AND/OR LT. BEN BLAINE PAY \$20,000 DOLLARS FOR WILLFULLY, PURPOSELY AND DELIBERATELY REFUSE TO ACKNOWLEDGE MY REPEATED LETTERS AND GRIEVANCES ASKING FOR THEIR HELP IN RECEIVING MEDICAL TREATMENT FOR OVER 70 DAYS TO PROTECT OFFICER MITCH HALL AND THE RANKIN COUNTY SHERIFF'S DEPARTMENT.

HAVE THE RANKIN COUNTY SHERIFF'S DEPARTMENT PAY \$20,000 FOR HIRING UNQUALIFIED AND INCOMPETENT MEDICAL STAFF, WHICH STAFF HAD TO ALL BE FIRED AROUND MID FEBRUARY OF 2013 BY MRS. LAVERN COLLUM, THE MEDICAL ADMINISTRATOR AND WHICH STAFF FOR OVER TWO MONTHS LOST MY MEDICAL REQUEST, ~~AND~~ negligently ignored my REQUEST OR WITH DELIBERATE INDIFFERENCE REFUSED TO GET ME TO THE DOCTOR FOR MEDICAL HELP. HAVE DR. MICHAEL REDDIX OWNER OF "HEALTH ASSURANCE LLC" PAY \$20,000 FOR HIRING UNQUALIFIED AND INCOMPETENT MEDICAL STAFF, WHICH STAFF HAD TO ALL BE FIRED AROUND MID FEBRUARY 2013, BY MRS. LAVERN COLLUM, THE MEDICAL ADMINISTRATOR

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pg 4 of 6

RELIEFCLAIM FOUR

INADEQUATE medical service, DELIBERATE indifference to medical needs.

And which STAFF FOR OVER TWO MONTHS lost my medical Request, negligently ignored my Request OR WITH DELIBERATE INDIFFERENCE Refused to get me to the DOCTOR FOR medical Help.

HAVE MRS. LAVERN COLLUM THE MEDICAL ADMINISTRATOR PAY \$20,000 FOR HIRING THE UNQUALIFIED AND INCOMPETENT MEDICAL STAFF WHICH SHE HAD TO FIRE ALL OF THEM AROUND MID FEBRUARY 2013, AND WHICH STAFF SHE ALLOWED FOR OVER TWO MONTHS TO lose my medical Request, negligently ignore my Request OR WITH DELIBERATE INDIFFERENCE Refused to get me to the doctor FOR medical Help. HAVE NURSE KATIE MINOR PAY \$20,000 DOLLARS, WHO ON OR AROUND December 26th 2012, AT my INITIAL intake VISIT HAD me sign medical Record Release FORMS TO OBTAIN my neurosurgeons medical Records so THAT the JAIL DOCTOR would HAVE them FOR the APPOINTMENT she WAS making FOR me WITHIN the next few days concerning my BACK PAIN. NURSE KATIE MINOR negligently AND DELIBERATELY WITH DELIBERATE INDIFFERENCE to my medical needs Refused to OBTAIN the medical Records AND Refused to make me an APPOINTMENT with the DOCTOR AND who left me to SUFFER FOR over 70 days.

HAVE THE CURRENT medical PROVIDER CHARGING INMATES FOR seeing the DOCTOR when these INMATES DO NOT see the DOCTOR, STOP CHARGING the INMATES when they DO NOT see the DOCTOR. HAVE the CURRENT medical PROVIDER STOP CHARGING INMATES IF IT TAKES MORE THAN FOUR (4) days to see a DOCTOR OR NURSE AND the INMATE SAYS they ARE NOT sick ANYMORE.

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RELIEFClaim Four

Inadequate medical service, deliberate indifference to medical needs.

HAVE THE CURRENT HEALTH PROVIDER, PROVIDE A DOCTOR AT THE JAIL TO SEE INMATES FOUR (4) TIMES A WEEK, THESE WILL BE FOUR (4) FULL DAYS SO IT WILL NOT TAKE 2-4 WEEKS TO SEE A DOCTOR. HAVE THE CURRENT MEDICAL PROVIDER, IF THE ATTENDING DOCTOR IS OWNER OR PART OWNER STOP TREATING INMATES. THE MEDICAL PROVIDER IS IN BUSINESS TO MAKE MONEY BY SAVING THE JAIL MONEY ON MEDICAL EXPENSES AND THE DOCTOR WILL BE BIAS CONCERNING THE MEDICAL WELFARE OF THE INMATES. HAVE THE CURRENT MEDICAL PROVIDER AT PILL CALL PROVIDE Tylenol UPON REQUEST WITHOUT BEING CHARGED \$8.00 OR FILLING OUT A MEDICAL REQUEST AND WAITING FOR WEEKS TO SEE THE DOCTOR

Claim FiveDENIAL OF ACCESS TO THE COURTS

HAVE THE RANKIN COUNTY SHERIFF'S DEPARTMENT AND JAIL IMPLEMENT A "LEGAL ASSISTANCE PROGRAM" FOR THE INMATES AT THE RANKIN COUNTY JAIL. CURRENTLY THIS JAIL HAS NO LEGAL ASSISTANCE PROGRAM AT ALL.

HAVE THE JAIL HIRE A DESIGNATED OFFICIAL WHO HAS LEGAL OR PARALEGAL EXPERIENCE AND IS A "NOTARY PUBLIC" OR WHO CAN GET PAPERS NOTARIZED TO RUN THIS PROGRAM AT LEAST THREE (3) DAYS A WEEK. HAVE THE JAIL FORMAT A "LEGAL HELP REQUEST SHEET" AVAILABLE UPON REQUEST. HAVE THIS REQUEST SHEET "STAMPED" WITH THE DATE IT WAS RECEIVED AND HAVE THEM ANSWERED AT LEAST ONCE A WEEK. HAVE A SPACE ON THE SHEET MARKED WITH, "IF YOU HAVE A COURT DEADLINE TO MEET, GIVE THE DATE OF THE DEADLINE," SO THAT THIS REQUEST CAN BE PROCESSED AND RETURNED TO THE INMATE

RELIEFCLAIM FIVEDENIAL OF ACCESS TO THE COURTS

Quickley To meet the Deadline. Also Have A Space On The Sheet marked "IF you need copies and mail service write WHICH COURT OR WHO you ARE sending the mail to". Have the legal assistance program provide; Addresses To The Courts, Any COURT IN MISSISSIPPI OR THE UNITED STATES, To The DISTRICT COURTS AND To Provide 42 U.S.C. §1983 PRISONER REQUEST FORMS upon Request.

Have THIS PROGRAM provide A LIST WITH ADDRESSES OF All THE legal programs AN INMATE CAN write To For Help, Such AS; THE MS. BAR, MS. ETHICS COMMISSION, THE A.C.H.U., THE N.A.A.C.P., ANY LAW FIRM, DISTRICT ATTORNEY OR COURT CLERK IN THE STATE OF MISSISSIPPI.

INMATES ARE BROUGHT HERE ON COURT ORDER AND HAVE CASES Pending In OTHER JURISDICTIONS. Have THIS PROGRAM provide limited Access To A LAW LIBRARY once A week, To provide RESEARCH MATERIALS SUCH AS CASE CITES, Rules OF COURT, Federal Rules OF CIVIL Procedure Rules OF EVIDENCE, Rules OF APPELLATE Procedure, To provide examples OF MOTIONS AND Pleadings, MS. STATUTES AND DEFINITIONS AND Sentencing guidelines, To provide A "POST CONVICTION RELIEF motion" PACKET WITH **CASE CITES**. Have make copies OF THE INMATES

legal work In THE PRESENCE OF THE INMATE, Have THIS PROGRAM mail INMATES legal work In THE PRESENCE OF THE INMATE AND WITH ENCLAVING THE MAIL In THE envelope. Have THIS PROGRAM log ALL legal mail coming In AND going OUT. Have LT. Ben Blaine Pay \$ 20,000 FOR willfully AND Purposely REFUSING To provide ADDRESSES To THE COURTS AND Refusing To make copies and mail my complaint To THE COURT AND WITH VINDICTIVENESS TRIED To Hinder my complaint FROM Reaching THE COURT

Have THIS COURT monitor THE Implementation AND Progress OF THIS PROGRAM. Rewrite THE Handbook To REFLECT THE INSTRUCTIONS.

CERTIFICATE OF SERVICE

I STEVEN RIDDLE, DO HEREBY CERTIFY THAT I
HAVE ON THIS DAY CAUSED TO BE MAILED VIA UNITED
STATES MAIL A 42 U.S.C. §1983 COMPLAINT TO THE U.S.
DISTRICT COURT CLERK AT 501 E. COURT STREET,
SUITE 2,500, JACKSON, MS. 39201. THIS IS ALSO
ATTESTED TO BY THE OFFICIAL'S SIGNATURE WHO IS RECEIVING
THE COMPLAINT FROM ME.

SO CERTIFIED ON THIS THE 7 DAY OF JUNE, 2013

By, Steven Riddle

STEVEN RIDDLE
221 N. TIMBER ST
BRANDON, MS, 39042

SIGNATURE AND NAME OF OFFICIAL RECEIVING COMPLAINT

RECEIVED BY A. Thompson Amanda Thompson

DATE JUNE, 7, 2013